

EXHIBIT A

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHABTAI SCOTT SHATSKY, ET AL.,

Plaintiffs,

Civil No.:
8 CIV. 12355 (MKV)

- against -

THE PALESTINE LIBERATION ORGANIZATION, ET AL.,

Defendants.

DEPOSITION OF

AWNI ABU HBA

Taken on April 7, 2021

		Page 2		Page 4
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2		I N D E X	2	*****
3	WITNESS	EXAMINATION BY	3	VIDEO-RECORDED REALTIME DEPOSITION of AWNI ABU HBDA,
4	AWNİ ABU HBDA	MR. SINAİKO	4	held on April 7, 2021, at 9:38 a.m., was sworn
5	AWNİ ABU HBDA	MR. BERGER	5	before AMBRIA İANAZZİ, a Registered Professional
6			6	Reporter, Certified Realtime Reporter, and Notary
7			7	Public.
8			8	*****
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2		(CONT'D)	2	A P P E A R A N C E S:
3		I N D E X	3	
4		MARKED FOR IDENTIFICATION	4	COHEN & GRESSER LLP
5	EXHIBIT	DESCRIPTION	5	Counsel for Plaintiffs
6	Exhibit 1	Subpoena	6	800 Third Avenue
7	Exhibit 2	Tab 1	7	New York, New York 10022
8	Exhibit 3	Tab 8	8	BY: STEPHEN M. SINAİKO, ESQ.
9	Exhibit 4	Tab 2	9	ssinaiko@cohengresser.com
10	Exhibit 5	Declaration of C. Russell	10	ERICA LAI, ESQ.
11	Exhibit 6	Subpoena to Produce	11	elai@cohengresser.com
12	Exhibit 7	Tab 13	12	ANDREW PECORARO, ESQ.
13	Exhibit 8	Tab 15	13	apecoraro@cohengresser.com
14	Exhibit 9	Tab 11	14	SQUIRE PATTON BOGGS
15			15	Attorneys for Defendants
16			16	1211 6th Avenue, 26th Floor
17			17	New York, New York 10036
18			18	BY: MITCHELL BERGER, ESQ.
19			19	mitchell.berger@squirepb.com
20			20	GASSAN A. BALOUL, ESQ.
21			21	gassan.baloul@squirepb.com
22			22	JOSEPH ALONZO, ESQ.
23			23	joseph.alonzo@squirepb.com
24			24	SALIM KADDOURA, ESQ.
25			25	salim.kaddoura@squirepb.com
				KROPF MOSELEY PLLC
				Counsel for the Witness
				1100 H Street NW, Suite 1220
				Washington, D.C. 20005
				BY: SARAH KROPF, ESQ.

<p>1</p> <p>2 (CONT'D)</p> <p>3 A P P E A R A N C E S :</p> <p>4</p> <p>5 ALSO PRESENT:</p> <p>6</p> <p>7 COSETTE VINCENT, Cohen & Gresser</p> <p>8 ELIZABETH BEZVERKHA, Cohen & Gresser</p> <p>9 HADEER AL AMIRI, Interpreter</p> <p>10 NAWEL MESSAOUDI, Interpreter</p> <p>11 COREY WAINAINA, Videographer</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 6</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p style="text-align: right;">Page 10</p> <p>1 A. ABU HBDA</p> <p>2 EXAMINATION BY</p> <p>3 MR. SINAICO:</p> <p>4 Q. And Mr. Abu Hbda, let me introduce myself.</p> <p>5 My name is Steve Sinaiko. I'm a partner in the law</p> <p>6 firm Cohen & Gresser LLP. We represent the</p> <p>7 Plaintiffs in this litigation and we appreciate you</p> <p>8 being here today. Have you ever had your deposition</p> <p>9 taken before, Mr. Abu Hbda?</p> <p>10 A. No.</p> <p>11 Q. Okay. Have you ever testified in court,</p> <p>12 in the United States, prior to today?</p> <p>13 A. No.</p> <p>14 Q. Okay. I'm just going to take a couple of</p> <p>15 minutes to go over some ground rules for our</p> <p>16 deposition today. First of all, you are here on the</p> <p>17 record. There is a court reporter and a</p> <p>18 videographer recording everything that we say today.</p> <p>19 In order to ensure that we have an</p> <p>20 accurate record, and especially because this</p> <p>21 deposition is being taken by videoconference,</p> <p>22 instead of in person, due to the COVID-19 Pandemic,</p> <p>23 it's important that we not speak over one another,</p> <p>24 and more than one person speaks at a time.</p> <p>25 So, I would be grateful if you wait until</p>	<p style="text-align: right;">Page 12</p> <p>1 A. ABU HBDA</p> <p>2 - o o o -</p> <p>3</p> <p>4 N A W E L M E S S A O U D I,</p> <p>5 Called as the interpreter in this</p> <p>6 matter, was duly sworn by a Notary Public to</p> <p>7 accurately and faithfully translate the</p> <p>8 questions propounded to the AWNI ABU HBDA</p> <p>9 from English into Arabic, and the answers</p> <p>10 given by the AWNIA ABU HBDA from Arabic into</p> <p>11 English.</p> <p>12</p> <p>13 - o o o -</p>
<p style="text-align: right;">Page 11</p> <p>1 A. ABU HBDA</p> <p>2 I finish my questions before you start answering</p> <p>3 them, and, of course, I'll try to wait until you</p> <p>4 finish your answers before I ask my next question;</p> <p>5 is that okay?</p> <p>6 A. Yes.</p> <p>7 Q. Okay.</p> <p>8 MS. KROPP: And sorry to interrupt, I</p> <p>9 think we'll have the translator translate your</p> <p>10 questions going forward; is that okay?</p> <p>11 MR. SINAICO: For the record, all my</p> <p>12 questions are being translated by the translator.</p> <p>13 Mr. Abu Hbda is being translated, answering the</p> <p>14 questions in English, and the questions are not</p> <p>15 being translated at this time.</p> <p>16 Q. Okay. As we work through our questions</p> <p>17 today, it's important that you respond to questions</p> <p>18 verbally because the court reporter and the record</p> <p>19 can't capture nods of the head, or gestures of the</p> <p>20 hand, so it's important to give verbal answers to my</p> <p>21 questions; is that okay?</p> <p>22 THE INTERPRETER: Yeah. I'm supposed to</p> <p>23 swear first. I'm sorry.</p> <p>24 MR. SINAICO: Oh, we need to swear in the</p> <p>25 translator.</p>	<p style="text-align: right;">Page 13</p> <p>1 A. ABU HBDA</p> <p>2 THE INTERPRETER: I'm sorry, I'm not</p> <p>3 supposed to do before the oath.</p> <p>4 Q. Okay. Mr. Abu Hbda, let's just -- let's</p> <p>5 just go back and translate, for Mr. Abu Hbda, my</p> <p>6 last question.</p> <p>7 THE INTERPRETER: Can you please repeat</p> <p>8 it?</p> <p>9 MR. SINAICO: Oh, certainly.</p> <p>10 Q. As we go through our questions today,</p> <p>11 Mr. Abu Hbda, it's important that you give verbal</p> <p>12 answers, because the court reporter will not be able</p> <p>13 to capture, and the record will not be able capture,</p> <p>14 head nods and hand gestures.</p> <p>15 So, do you understand that you will need</p> <p>16 to give verbal answers to the questions that I ask</p> <p>17 you today?</p> <p>18 A. Yes.</p> <p>19 Q. Okay.</p> <p>20 A. Thank you.</p> <p>21 Q. So, Mr. Abu Hbda, I'm going to be asking</p> <p>22 you a series of questions today. If at any time,</p> <p>23 there's a question you don't understand, please let</p> <p>24 me know, and I'll try to rephrase the question for</p> <p>25 you, or make it more clear. But understand that if</p>

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1	A. ABU HBDA	1	A. ABU HBDA
2	you do answer a question, I will assume, and the	2	MR. BERGER: Yeah. If the translator is
3	Court will assume, and everyone in this room will	3	translating it from the realtime, we would like to
4	assume, that you understood each question that you	4	have it.
5	respond to; do you understand?	5	MR. SINAICO: Okay. Great. So, we could
6	A. Yes.	6	reach out to the support people from U.S. Legal,
7	Q. Okay. It is possible that during the	7	so you could have the realtime.
8	course of our deposition today, your counsel or one	8	THE VIDEOGRAPHER: You guys want to go off
9	of the other lawyers in the room may object to one	9	the record?
10	of my questions. Unless your counsel instructs you	10	MR. MR. SINAICO: Let's go off the record.
11	not to answer a question that I've asked you, and	11	THE VIDEOGRAPHER: The time is 13:55.
12	your counsel is the only person who's permitted to	12	(Whereupon, a short recess was taken.)
13	so instruct you, you should answer my questions	13	THE VIDEOGRAPHER: We are now back on the
14	without regard to any objections that may be raised	14	record. The time is 14:15 UTC Time.
15	by any of the lawyers in the room; do you	15	Q. Mr. Abu Hbda, just before we took this
16	understand?	16	short break, I was about to tell you that in the
17	A. Yes. Okay.	17	event that, you know, I will be taking periodic
18	MR. SINAICO: Just for the record, I	18	breaks during the deposition, and I understand that
19	think -- I think, going forward, the translator	19	you will need breaks, and I understand from your
20	has been translating Mr. Abu Hbda's answers, and I	20	counsel that you will need periodic breaks, just let
21	think it's just going to go more smoothly if we	21	me know, or let Ms. Kropf know, and we will do that.
22	have all of the answers translated, just for the	22	I just ask that if there's a pending question, that
23	record. I know that the answers have all been	23	you will not take a break before you answer the
24	translated.	24	question; is that okay?
25	And, you know, Sara, unless you object to	25	A. Okay.
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1	A. ABU HBDA	1	A. ABU HBDA
2	it, I think we should have all the answers	2	Q. Okay. Mr. Abu Hbda, are you currently
3	translated; it's going to go more smoothly.	3	under the influence of any medication or other
4	MS. KROPF: That's fine. So, Awni, you	4	substance that might inhibit your ability to
5	can have the answers translated to English and,	5	understand and respond to questions?
6	then you can answer in Arabic; okay?	6	A. Not drugs, but I'm taking medication, yes.
7	A. I prefer speaking in Arabic.	7	Q. Okay. And does the medication that you're
8	Q. Okay.	8	taking, Mr. Abu Hbda, interfere with your ability to
9	MR. BERGER: Excuse me, I have a question.	9	recall or understand questions?
10	This is Mitchell Berger. Is the translator	10	A. I don't think so.
11	translating from a realtime transcript, because we	11	Q. Okay. And the medication that you're
12	don't have that, or is she translating from notes	12	taking, Mr. Abu Hbda, does it interfere with your
13	that she is taking, or from what Steve is saying?	13	memory in any way?
14	MR. SINAICO: Mitch, are you asking to	14	A. I'm not a doctor. I don't know.
15	have the realtime because I think we can arrange	15	Q. Is it your sense, Mr. Abu Hbda, that
16	that, if --	16	there's any reason, as you sit here today, that
17	MR. BERGER: We ordered the realtime. It	17	you're unable to give your best testimony?
18	hasn't been provided to us.	18	A. I think I can do my best today.
19	MR. SINAICO: Do we have a support person	19	Q. Thank you very much. Okay.
20	from U.S. Legal today, because I'm sure we do.	20	MR. SINAICO: Cosette, could we put up Tab
21	MR. BERGER: My question is, is Mess	21	14, please?
22	translating from the realtime?	22	MS. VINCENT: Yeah.
23	MR. SINAICO: Okay. But my question is,	23	MR. SINAICO: I would like to mark as our
24	if you didn't get the realtime, and we have the	24	next exhibit, or our first exhibit, Exhibit 1, a
25	realtime, we would like you to have it.	25	three-page document titled, "Subpoena to Testify

Page 18	Page 20
A. ABU HBDA	A. ABU HBDA
1 at a Deposition in a Civil Action".	2 with Ms. Kropf over the telephone in anticipation of
2 (Whereupon, Subpoena was marked as Exhibit 1	3 your deposition?
3 for identification, as of April 7th, 2021.)	4 A. More than -- more than once, but I don't
5 Q. Mr. Abu Hbda, do you have Exhibit 1? Are	5 recall how many times.
6 you able to see Exhibit 1?	6 Q. Do you think it was more than five times?
7 A. Yes.	7 A. No; less.
8 Q. Okay. And Mr. Abu Hbda, have you seen	8 Q. Do you remember when the first time was
9 this document before?	9 that you spoke with Ms. Kropf, in anticipation of
10 A. Yes.	10 your deposition?
11 Q. And Mr. Abu Hbda, do you recognize this	11 MS. KROPF: I object. I mean, I think
12 document to be a subpoena calling on you to testify	12 we're -- you asked if he talked to me. You asked
13 in this deposition today?	13 what he did to prepare. When he first talked to
14 A. Yes.	14 me is not a relevant or a proper question here.
15 Q. Okay. And Mr. Abu Hbda, you're here today	15 MR. SINAJKO: You may answer.
16 testifying pursuant to the Subpoena that we've	16 MS. KROPF: No.
17 marked as Exhibit 1, correct?	17 Mr. Abu Hbda, I instruct you not to
18 A. Yes.	18 answer.
19 Q. Okay. Now, in advance of your deposition	19 MR. SINAJKO: What's the basis for
20 here today, did you do anything to prepare for the	20 instructing him not answer when he spoke to you?
21 deposition?	21 MS. KROPF: Because it gets into
22 A. Yes.	22 attorney-client privilege communications, when he
23 Q. Can you tell us, Mr. Abu Hbda, what you	23 spoke to --
24 did to prepare for your deposition today.	24 MR. SINAJKO: I'm probing his answer. I'm
25 A. I saw all the document I have in my -- in	25 entitled to ask how he spoke to you for the
Page 19	Page 21
A. ABU HBDA	A. ABU HBDA
1 the office -- in my office.	2 deposition today.
3 Q. Can you tell us what documents you looked	3 MS. KROPF: And he answered. He spoke to
4 at? To be more precise -- well, let me withdraw	4 me by phone and looked at the records. Any other
5 that.	5 questions is attorney-client privilege.
6 Can you tell us what the documents were	6 MR. SINAJKO: That's an improper
7 that you looked at more specifically?	7 instruction. We'll have to go about that --
8 A. Okay. The paper I do for the -- for	8 MS. KROPF: Don't answer that question.
9 the -- for my -- for my client, I sent to the --	9 Q. Aside from talking to Ms. Kropf, did you
10 THE INTERPRETER: I'm sorry. I will ask	10 speak to anybody else in anticipation of your
11 him to repeat, because I didn't really understand.	11 deposition?
12 A. I checked -- I checked -- I checked the	12 A. No.
13 paper I used to -- I sent to the -- to my client, I	13 Q. By the way, when you spoke to Ms. Kropf in
14 used to send to the Embassy.	14 anticipation of your deposition, did those
15 Q. And were those papers for your notary	15 conversations take place in English?
16 public business, sir?	16 A. Yes.
17 A. Yes.	17 Q. Okay. At any time before your deposition
18 Q. Okay. In anticipation of your deposition	18 today, have you spoken to Mitchell Berger, who is
19 today, Mr. Abu Hbda, did you meet with anybody?	19 attorney for the Defendants, and is on our
20 A. No.	20 videoconference today?
21 Q. Okay. So, did you meet with Ms. Kropf,	21 A. No.
22 your lawyer, in anticipation of the deposition	22 Q. At any time before your deposition today,
23 today?	23 have you spoken with Mr. Gassan Baloul, who is also
24 A. I talked to her over the phone.	24 an attorney for the Defendants, and who is also on
25 Q. Okay. And how many times did you speak	25 our videoconference today?

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1	A. ABU HBDA	1	A. ABU HBDA
2	A. No.	2	MS. KROPF: Why don't you answer the
3	Q. Okay. In advance of your deposition	3	question?
4	today, have you spoken with any lawyer associated	4	MR. SINAJKO: Can the reporter please
5	with the law firm Squire, Patton, Boggs, who are	5	repeat the question?
6	Counsel for the Defendants in this action?	6	(Whereupon, the requested portion was read
7	A. No.	7	back by the reporter.)
8	Q. Okay. And your lawyer, Ms. Kropf, how did	8	A. Yes. Ms. Kropf. No.
9	you --	9	Q. Okay. And how did you come to be
10	Before you received the Subpoena that	10	introduced to Ms. Kropf?
11	we've marked as Exhibit 1, have you ever met or	11	A. Through the --
12	spoken to Ms. Kropf?	12	THE INTERPRETER: I'm sorry.
13	MS. KROPF: Objection.	13	A. Through the Internet.
14	And Mr. Abu Hbda, you do not need to	14	Q. Mr. Abu Hbda, is it the case that you
15	answer that question.	15	located Ms. Kropf and hired her as your lawyer on
16	MR. SINAJKO: That is not a proper	16	your own?
17	objection. Come on. I'm entitled to know when he	17	A. Yes.
18	spoke to you. I'm not asking for the substance of	18	Q. Okay. And are you paying Ms. Kropf out of
19	the communications. I'm just asking whether there	19	your own funds, sir?
20	were any, because --	20	MS. KROPF: Objection.
21	MS. KROPF: No, because it would have	21	Q. You may answer.
22	nothing to do with before he received the	22	MS. KROPF: No, he's not going to answer
23	Subpoena, nothing to do with this case, in	23	that, Steve. It's not relevant. It gets into the
24	connection with this matter, and that's an	24	attorney-client.
25	improper question. You could take it up with the	25	MR. SINAJKO: Relevance is not a basis for
Page 23		Page 25	
1	A. ABU HBDA	1	A. ABU HBDA
2	Judge.	2	an instruction not to answer, and the questions as
3	MR. SINAJKO: I don't want this to be a	3	to issuance and payments of bills is absolutely
4	contentious deposition. The question is not a	4	not privileged. I'm not asking for any
5	privilege question. Relevance objections are not	5	communications between you and he. I asked for
6	an appropriate basis to instruct a witness not to	6	the arrangement between you and he, with respect
7	answer. The Witness should answer the question.	7	to payment of bills, and whether he's paying them;
8	MS. KROPF: You're asking --	8	that is not a privilege question.
9	MR. SINAJKO: Are you instructing him not	9	MS. KROPF: Your arrangement --
10	to answer based on relevance?	10	MR. SINAJKO: If you're going to instruct
11	MS. KROPF: Are you asking him whether or	11	him on things like that, we're going to have to go
12	not he has spoken to me, an attorney, before he	12	to the Judge, which I'd rather not do.
13	received the Subpoena?	13	MS. KROPF: The arrangement we have is in
14	MR. SINAJKO: That's exactly what I'm	14	writing. It's a communication between us.
15	asking. Did he have any contact with you, in	15	I instruct you not to answer.
16	advance of receiving the Subpoena; that's what I'm	16	If you want to call the Judge, I invite
17	asking.	17	you to do so. It goes to the attorney-client
18	MS. KROPF: As long as you limit your	18	privilege written engagement letter, and I'm
19	answer to that.	19	instructing him not to answer.
20	I think we're getting into dangerous	20	MR. SINAJKO: The relationship of his with
21	territory, whether or not he worked with me	21	you is not privileged. The communications with
22	before, or whether or not he'd spoken to me before	22	you is privileged. Let me see if I could put --
23	is really not relevant.	23	slightly ask the question. I don't want to have
24	MR. SINAJKO: I'm feeling pretty safe, so	24	to go to the Judge, and this is going to take
25	the Witness can answer the question.	25	longer.

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1	A. ABU HBDA	1	A. ABU HBDA
2	Q. Mr. Abu Hbda, are you personally paying	2	2.
3	the bills that Ms. Kropf issues for her services in	3	(Whereupon, Tab 1 was marked as Exhibit 2 for
4	connection with this matter?	4	identification, as of April 7th, 2021.)
5	MS. KROPF: And I object, and I am	5	THE INTERPRETER: Excuse me, can we go off
6	instructing him not to answer. If you want to	6	record? Can I ask you if we could go off record?
7	call the Court, Steve, then let's go ahead and	7	It's now --
8	stop, and why don't we go ahead and take care of	8	MR. SINAICO: Sure. If we need to go off
9	it.	9	the record for a moment, we could do that.
10	MR. SINAICO: I mean, really, this is	10	THE INTERPRETER: Yeah. Can I talk to
11	improper. We're going to put a pin in it, and	11	you?
12	we're going to come back to it, if we have to.	12	THE VIDEOGRAPHER: Okay. Does everyone
13	This is not a proper objection. If we have to go	13	agree to go off the record?
14	to the Judge, or go to Mr. Abu Hbda, you know,	14	MS. KROPF: Yup.
15	because of this kind of thing, I would hate to do	15	THE VIDEOGRAPHER: Okay. We are now off
16	it, but we will have to, if we will. Okay.	16	the record. The time is 14:40 UTC Time.
17	Q. Okay. You mentioned before, Mr. Abu Hbda,	17	(Whereupon, a short recess was taken.)
18	you reviewed certain documents in anticipation of	18	THE VIDEOGRAPHER: We are now back on the
19	your deposition. Do you remember more specifically	19	record. The time is 14:45 UTC Time.
20	what those documents were?	20	Q. Mr. Abu Hbda, can you see Exhibit 2?
21	A. Okay. Power of Attorney for my client.	21	A. Yes.
22	Q. And what is the nature of these Powers of	22	Q. Okay. And do you recognize this document?
23	Attorney that you mentioned?	23	And by the way, if you want to page through it, we
24	A. Services for -- for the people from my --	24	can page through it.
25	from my back home, from my community.	25	A. Yes.
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1	A. ABU HBDA	1	A. ABU HBDA
2	Q. You mean your community here in the United	2	Q. And just to be clear, Mr. Abu Hbda, you
3	States?	3	recognize the document; is that correct?
4	A. Yes.	4	A. Yes.
5	Q. And are these Powers of Attorney with	5	Q. And what do you recognize this document to
6	respect to business dealings outside the United	6	be, Exhibit 2?
7	States?	7	A. It's from the Website, from my computer --
8	THE INTERPRETER: Excuse me, could you	8	from the computer.
9	please repeat?	9	Q. And this Website is a website that is --
10	MR. SINAICO: Sure. Let me put the	10	well, let me withdraw that.
11	question a second time.	11	Is this Website something that you
12	Q. Are these Powers of Attorney you	12	created, or that was created under your direction,
13	mentioned, Mr. Abu Hbda, with respect to matters	13	sir?
14	outside the United States?	14	A. Yes, for me.
15	A. They were special -- they were cases	15	Q. And what is the purpose of the Website
16	special for my client.	16	from which we drew Exhibit 2?
17	Q. Okay.	17	A. Advertising. Advertisement.
18	MR. SINAICO: Okay. Cosette, could we	18	Q. And let's turn to -- actually, hang on one
19	bring up Tab 1, please?	19	second. I want to page through the document.
20	MS. VINCENT: Yeah.	20	MR. SINAICO: Cosette, could you turn us
21	MR. SINAICO: Let's mark Tab 1, the	21	to the last page of the document, please?
22	document, you know -- let's mark that as our next	22	Q. Okay. I'm looking. Do you see the last
23	exhibit, Exhibit 2, a six-page document that we	23	box on the page of the document of Exhibit 2?
24	printed from a Website titled,	24	A. Now, I can see it.
25	"Palestiniandocs.com"; let's mark that as Exhibit	25	Q. Okay. And you see that it says, "Awni Abu

<p style="text-align: right;">Page 30</p> <p>1 A. ABU HBDA</p> <p>2 Hbda Documentation Services"; do you see that?</p> <p>3 A. Yes. Yes.</p> <p>4 Q. And is that the name of your business,</p> <p>5 sir?</p> <p>6 A. It's part of my business, yes.</p> <p>7 Q. Okay. And is Awni Abu Hbda Documentation</p> <p>8 Services organized as a corporation, or some other</p> <p>9 sort of legal entity?</p> <p>10 A. It's a -- only my own. It's for my --</p> <p>11 yeah, mine person.</p> <p>12 Q. Okay. So, is it organized as a</p> <p>13 corporation, or a limited liability company, or</p> <p>14 anything like that?</p> <p>15 A. No. No.</p> <p>16 Q. Okay. And so would it be fair to say that</p> <p>17 Awni Abu Hbda Documentation Services is a business</p> <p>18 name that you use yourself, sir?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. When did you start Awni Abu Hbda</p> <p>21 Documentation Services?</p> <p>22 A. I don't recall; maybe a year, or a year</p> <p>23 and a half.</p> <p>24 Q. So, you think, sir, that the business was</p> <p>25 funded in 2019 or 2020; is that correct?</p>	<p style="text-align: right;">Page 32</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay. Let's step back just half a step</p> <p>3 here, Mr. Abu Hbda.</p> <p>4 Could you please tell me your educational</p> <p>5 history, since you graduated high school?</p> <p>6 A. Paterson. So --</p> <p>7 THE INTERPRETER: Sorry.</p> <p>8 A. So, I took courses in community college in</p> <p>9 Paterson, but I didn't finish, and so I took some --</p> <p>10 THE INTERPRETER: Hold on, sorry --</p> <p>11 A. Yes, and I took some lecture on insurance,</p> <p>12 and I had my license. I had my license.</p> <p>13 MR. SINAICO: Okay. Let's take just a</p> <p>14 half a step backwards.</p> <p>15 Actually, Cosette, could you bring up Tab</p> <p>16 8, please, and let's mark it as Exhibit 3.</p> <p>17 Okay. And so we're marking Exhibit 3, a</p> <p>18 four-page excerpt, which we printed from the same</p> <p>19 Website from which we extracted Exhibit 2.</p> <p>20 (Whereupon, Tab 8 was marked as Exhibit 3 for</p> <p>21 identification, as of April 7th, 2021.)</p> <p>22 MR. SINAICO: I'll just ask Mr. Abu Hbda</p> <p>23 quickly --</p> <p>24 Q. Do you recognize this to be a page from</p> <p>25 the Website for your business?</p>
<p style="text-align: right;">Page 31</p> <p>1 A. ABU HBDA</p> <p>2 A. The Website maybe, yes.</p> <p>3 Q. Okay. But not the Website, the business</p> <p>4 itself. The business that is Awni Abu Hbda</p> <p>5 Documentation Services, when did you start that</p> <p>6 business?</p> <p>7 A. It wasn't the business.</p> <p>8 THE INTERPRETER: Okay. Okay.</p> <p>9 A. It -- before, it wasn't really a business.</p> <p>10 Before, I was not having paper. Before, I didn't</p> <p>11 have -- I haven't have a Website. I only had the</p> <p>12 Website maybe a year, or a year and a half ago.</p> <p>13 Before, I was doing only, like once week,</p> <p>14 or couple of like -- or couple of times a week. It</p> <p>15 wasn't really a business.</p> <p>16 Q. Okay. What was the nature of the</p> <p>17 activities that you were engaged in, Mr. Abu Hbda,</p> <p>18 that, you know, that you were doing once or twice a</p> <p>19 week, and that, apparently now is Awni Abu Hbda</p> <p>20 Documentation Services?</p> <p>21 A. I -- I am.</p> <p>22 THE INTERPRETER: Hold on. Okay.</p> <p>23 A. I am -- I am a notary public, and</p> <p>24 accountant since 1980, and I was doing insurance</p> <p>25 since 1980.</p>	<p style="text-align: right;">Page 33</p> <p>1 A. ABU HBDA</p> <p>2 A. Yes.</p> <p>3 Q. And this is part of the Website that</p> <p>4 either you created, or which was created under your</p> <p>5 direction; is that correct?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Let's turn to the second page. So,</p> <p>8 you see the second and third pages had some text</p> <p>9 that's titled, "Palestinian Traditions and American</p> <p>10 Freedoms Blend Perfectly in Paterson"; do you see</p> <p>11 that?</p> <p>12 A. Yes.</p> <p>13 Q. Is that text that you wrote, sir?</p> <p>14 A. No.</p> <p>15 Q. Okay. Is that text --</p> <p>16 That's text that you got from another</p> <p>17 source; is that right?</p> <p>18 THE INTERPRETER: Okay.</p> <p>19 A. It's another magazine. New Jersey</p> <p>20 magazine write it -- wrote it, not me.</p> <p>21 Q. Do you believe the information presented</p> <p>22 in this text is accurate?</p> <p>23 A. I don't know. They wrote it, not me.</p> <p>24 Q. Okay. But you posted it on your Website,</p> <p>25 correct?</p>

Page 34		Page 36
1	A. ABU HBDA	
2	A. True.	1 the Institute of Insurance?
3	Q. Okay. Let's look at the first sentence.	3 A. Cars, and real estate property, and
4	It says here, "Awni Abu Hbda came to the United	4 casualty.
5	States to improve his English skills"; do you see	5 Q. Were the purposes of these courses to help
6	that? We could enlarge it, if that would be	6 you learn about selling property and casualty
7	helpful.	7 insurance?
8	MR. SINAJKO: Cosette, could you zoom in	8 A. I was learning how to sell insurance.
9	for us?	9 Q. Okay. And did you receive any sort of
10	THE INTERPRETER: Thank you.	10 degree or certificate from the Institute of
11	A. Yes, I do.	11 Insurance?
12	Q. Okay. And so that statement is accurate,	12 A. I have New Jersey license.
13	correct?	13 Q. Okay. We'll come back to that in just a
14	A. Maybe it was -- it's 50 years ago.	14 moment.
15	Q. Actually, that's -- that takes to the next	15 Apart from the Institute of Insurance and
16	sentence. It's -- looking at the next sentence --	16 College in Paterson, have you taken any course at
17	and I recognize this may have been written sometime	17 any institution in the United States?
18	ago -- it says, "Following in the footsteps of an	18 A. No.
19	older brother, Awni Abu Hbda, now 68, arrived in	19 Q. Okay. Now, you mentioned a moment ago
20	America in 1971"; do you see that?	20 that you are a notary public; do you recall that?
21	A. Yes.	21 A. Yes.
22	Q. And that's, in fact, when you arrived in	22 Q. And in what state are you commissioned a
23	America, sir; is that correct?	23 notary public?
24	A. I think; yes.	24 A. New Jersey State.
25	Q. Okay. And the sentence goes on to say	25 Q. Okay. And you mentioned that you have
Page 35		Page 37
1	A. ABU HBDA	
2	that you graduated from Birzeit University; is that	1 A. ABU HBDA
3	correct?	2 some sort of an insurance license; do you recall
4	A. Well, I -- I went to that school, but I	3 that?
5	never graduated.	4 A. I used --
6	Q. Okay. And so you never received a degree	5 THE INTERPRETER: Okay.
7	from Birzeit University; is that correct?	6 A. I used to have; not now.
8	A. No.	7 Q. Okay. And when did you get the insurance
9	Q. Have you ever received any degree from any	8 license?
10	university?	9 A. I don't recall, but I think 1980.
11	A. No. No.	10 Q. And you don't currently have the license,
12	Q. Do you have a high school degree, sir?	11 correct?
13	A. Yes.	12 A. No.
14	Q. Okay. And you mentioned that you	13 Q. When did the license expire?
15	attended -- in the United States, you attended some	14 A. I don't recall; maybe 1995, '96. I don't
16	classes at a community college at Paterson, New	15 recall.
17	Jersey; do you recall that?	16 Q. Apart from the insurance license, and the
18	A. Yes.	17 Notary Public Commission that you hold from the
19	Q. Okay. Apart from the community college in	18 State of New Jersey, do you hold any other licenses
20	Paterson, New Jersey, have you ever taken classes at	19 or certificates from any government authority, you
21	any other educational institution in the United	20 know, other than the State of New Jersey, anywhere
22	States?	21 in the world?
23	A. Okay. Institute of Insurance for houses,	22 A. No.
24	car, and life.	23 MR. SINAJKO: Okay. Let's -- if we could,
25	Q. And what sorts of classes did you take at	24 Cosette, could you take us back to the first page
		25 of Exhibit 3, and let's zoom in at the top of the

Page 38		Page 40	
1	A. ABU HBDA	1	A. ABU HBDA
2	page. I don't think we have the top of the page.	2	THE INTERPRETER: Okay. Okay.
3	We're missing the top of the page. Could you zoom	3	A. I'm a notary public who is witness to
4	in? There you go. Could we zoom in on the	4	either Palestinian, or somebody else who -- who --
5	Internet address?	5	who witness and sign the paper for everybody, and
6	Q. Mr. Abu Hbda, do you see that the Internet	6	send paper to either the Palestinian Embassy, or
7	address for the Website that you use for your	7	other embassies.
8	business is, "Palestiniandocs.com"?	8	Q. Okay. So, one of the -- sir --
9	A. Yes.	9	Is it fair to say, sir, that one of the
10	THE INTERPRETER: Sorry.	10	services that you offer through your business is the
11	Q. And is that an Internet name that you	11	submission of documents on behalf of your clients,
12	selected?	12	to the Palestinian Authority?
13	A. Yes.	13	THE INTERPRETER: Okay. Okay.
14	Q. How did you come to select that name for	14	A. No, I only send it to the Embassy if --
15	your business?	15	THE INTERPRETER: Okay.
16	A. It's a business name; nothing else.	16	A. I don't send -- usually, I -- I don't --
17	Q. All right. I'm just asking why you chose	17	usually, I don't send the paper to the Embassy. I
18	that name.	18	only send the paper if -- if the person ask me. I
19	A. It's a business name, that's all.	19	don't know how to send to the Embassy. Usually, I
20	Q. Was there any particular reason that you	20	don't do it.
21	chose that name, as opposed to some other name?	21	Q. Okay. So, one of the --
22	A. There is no reason.	22	Is it fair to say, sir, that one of the
23	Q. Do you specialize, or does your business	23	services --
24	have a specialty in dealing with Palestinian	24	MR. BERGER: Excuse me, I'm going to
25	documents?	25	object to the translation. We all heard the
Page 39		Page 41	
1	A. ABU HBDA	1	A. ABU HBDA
2	A. No.	2	answer in English. The translation has generally
3	Q. In your business, do you frequently deal	3	been terrible. We heard the answer in English.
4	with documents that are either being submitted to,	4	It's on the videotape. The word, "usual," was
5	or being issued by the Palestinian government --	5	never used.
6	actually, I withdraw the question. Let me ask the	6	MR. SINAJKO: I'm going to say, Mr. Abu
7	question again.	7	Hbda requested a translator today. I assume he
8	Do you specialize, or does your business	8	took the position that his English is not able to
9	have a specialty, in dealing with documents issued	9	testify today. Mr. Abu Hbda's English is pretty
10	by the Palestinian Authority?	10	good. He seems to understand my questions well.
11	A. No.	11	He often starts to answer them before the
12	Q. In your business, do you frequently deal	12	translator has finished translating, and my
13	with documents that are being submitted to or were	13	question is, why did we go -- I mean, if Abu Hbda
14	issued by the Palestinian Authority?	14	is able to answer questions in English, why do we
15	THE INTERPRETER: Okay.	15	have a translator here today? That's a question
16	A. I -- I -- I witness -- I witness notary	16	for Ms. Kropf.
17	public to everybody.	17	MS. KROPF: If you recall, Steve, we
18	THE INTERPRETER: I'm sorry.	18	started the deposition by saying why doesn't he
19	A. Everyone, from everywhere -- from --	19	answer the questions in English, and he translated
20	from -- I witness notary public for everybody from	20	the answer, and we started with that process, and
21	everywhere around the world.	21	you said it was smoother to have him answer, and
22	Q. Okay. Do you deal --	22	have her translate in English.
23	In your business, sir, do you deal with	23	My suggestion is, why don't I talk to
24	documents that are being submitted to the	24	Mr. Abu Hbda, and see how it's going, and see this
25	Palestinian Authority?	25	process before, and see how it's working.

Page 42	Page 44
A. ABU HBDA	A. ABU HBDA
I take your point. It's your deposition. We suggested the translator in case there were any issues, but my suggestion was that he answered in English. I thought you said it was smoother if he answered in Arabic.	He's saying something in Arabic, and he was saying something in English, and I have to say both, so that's why I was translating both; that's what I did.
MR. SINAJKO: Actually, I -- the court reporter explained, and I agree, there has to be a consistent way that we're doing this. It's not possible for us to rely on translations of the questions, and answers in English. Like, either it's a translated deposition, or it's not a translated deposition.	MR. SINAJKO: Understood. That's actually one of the things that we have to work out here, whether it makes sense to have the translated deposition, whether Mr. Abu HBDA's skills -- it's more sensible, and more efficient to just proceed in English. So, why don't we go off the record. We'll resume at 11:35, and we'll figure out how to handle this.
And if we're going to have him testify in English, which I, actually, having now watched this unfold for a while now, because I'm sort of learning a little bit myself about Mr. Abu HBDA's English skills, it seems to me that he understands pretty well, and, you know, given his background, he's been in the United States for 50 years, it's not surprising that he understands pretty well.	THE VIDEOGRAPHER: Okay. We're now off the record. The time is 15:22 UTC Time.
If you want to take a break, that's fine, and if you want to make sure it makes sense to continue with the translator, or whether we ought to -- ought to excuse the translator and continue	(Whereupon, a short recess was taken.)
MR. SINAJKO: So, before we resume the examination of Mr. Abu HBDA, I just want to summarize the conversation that Ms. Kropf and I had off the record, which is that, although Mr. Abu HBDA's English skills are pretty good, Ms. Kropf informed me that Mr. Abu HBDA is more comfortable having a translator on the call for	THE VIDEOGRAPHER: We are now back on the record. The time is 15:39 UTC Time.
Page 43	Page 45
A. ABU HBDA	A. ABU HBDA
the deposition after the break in English only.	which reason, we're going to, at least for the time being, continue using the translator, and we could continue to reevaluate that as we move forward; is that fair, Ms. Kropf?
MS. KROPF: I would like to talk to my client about that because there's a comfort point here, you know -- because you're going to ask questions that are probably technical. The words are very much going to matter, and I don't know how he feels about the translation. So, why don't we take a 15-minute break, and I'll talk to him, and if you want to, you know, the counsel can talk offline as well.	MS. KROPF: That's correct. Thanks, Steve.
MR. SINAJKO: Sure. So, it's 11:21 now, according to my clock. Why don't we plan to resume ourselves at -- you want to resume at 11:45?	MR. SINAJKO: Okay.
MS. KROPF: I don't know if we need that long.	Q. I think we were looking at --
MR. SINAJKO: We don't need that much time.	MR. SINAJKO: Okay. Let's go back to Exhibit 3.
MS. KROPF: I think 15 minutes is 11:35.	And Cosette, could we go to Page 2, please? And could we zoom in on the one, two -- third paragraph.
MR. SINAJKO: That's perfect. Why don't we go off the record and resume at 11:35.	Q. All right. Mr. Abu HBDA, can you see the third paragraph of that text that's, you know, part of the Exhibit 3?
THE VIDEOGRAPHER: We're off the record --	A. Yes.
THE INTERPRETER: I want to say something in English, and this is --	Q. Okay. And I'm looking at the second -- the second sentence of Paragraph 3. It says that you studied business and political science at Passaic County Community College, and William Paterson Community College; is that correct?
	A. It's just some --
	MR. SINAJKO: I'm just going to note for

Page 50		Page 52		
1	A. ABU HBDA			
2	Q. I'm sorry, can you --	1	Q. Okay.	
3	A. In Paterson, Commissioner comments --	2	MR. SINAICO: Cosette, let's bring up Tab	
4	Commissioner Institutes of Paterson. Commissioner	3	2, please. And I would like to mark this as our	
5	Institutes of Paterson.	4	next exhibit; I think it's going to be Exhibit 4.	
6	Q. Okay. Mr. Abu Hbda, was your answer a	5	(Whereupon, Tab 2 was marked as Exhibit 4 for	
7	moment ago that you also served as some sort of a	6	identification, as of April 7th, 2021.)	
8	Commissioner in Paterson, New Jersey?	7	MR. SINAICO: Cosette?	
9	A. Yes.	8	MS. VINCENT: Yes. Bringing it up.	
10	Q. We should wait for the translator to	9	MR. SINAICO: Please. Okay. Thank you.	
11	answer for you, and then would you answer --	10	So, I would like to mark for identification as	
12	By the way, let's get through this	11	Exhibit 4 a three-page excerpt from Mr. Abu Hbda's	
13	question and we'll come back.	12	Website, and --	
14	MR. SINAICO: Could the court reporter	13	Q. And I would ask you, Mr. Abu Hbda, can you	
15	read back the question, please?	14	see the document?	
16	(Whereupon, the requested portion was read	15	A. Yes.	
17	back by the reporter.)	16	Q. And do you recognize this to be an excerpt	
18	A. I used to be Commissioner of the institute	17	for the Website that you obtained for your business?	
19	of Paterson.	18	A. Yes.	
20	Q. Sir, is it accurate that you were a --	19	Q. And this page of your Website was prepared	
21	that you held the title of Commissioner of the City	20	by you or under your direction, correct?	
22	of Paterson, New Jersey -- you were one of the --	21	A. Yes, I -- I -- yes, I took it, but it	
23	withdrawn.	22	wasn't me who prepared.	
24	Is it accurate, sir, that you held the	23	Q. So, it wasn't you who prepared -- oh, I'm	
25	title Commissioner in the City of Paterson, and that	24	sorry. Let me withdraw that.	
Page 51		Page 53		
1	A. ABU HBDA			
2	you were one of a number of Commissioners in that	1	1	Just to be clear, Mr. Abu Hbda, your
3	city?	2	testimony is that you didn't prepare the document,	
4	A. I used to be the Commissioner, the	3	4	or you didn't prepare this document, but you checked
5	Institute of Paterson, and the Library Boards.	5	5	its content and you agreed with its content,
6	Q. Were those appointed commissions, or --	6	6	correct?
7	withdrawn.	7	A. Yes, I checked it and I agree on it. I	
8	Were those appointed positions or elected	8	agreed on it.	
9	positions?	9	MR. SINAICO: Okay. Let's turn to Page 2	
10	A. It's appointed.	10	of the document.	
11	Q. Okay. And apart from your positions in	11	Q. At the top of the page, Mr. Abu Hbda, do	
12	the City of Paterson as Deputy Mayor, and	12	you see that it says, "Legalize You Documents"?	
13	Commissioner, and the Library Board, have you ever	13	THE INTERPRETER: I don't see it.	
14	held any other title with any government body?	14	MR. SINAICO: At the top of the page, in	
15	THE INTERPRETER: Okay.	15	the center, "Legalize You Documents"?	
16	A. With the government, no.	16	THE INTERPRETER: Oh, yeah. Okay.	
17	Q. Okay. Have you ever held a title given to	17	A. Yes.	
18	you by the Palestinian Authority?	18	Q. Okay. And can you explain to us -- well,	
19	A. No.	19	withdrawn.	
20	Q. Have you ever been an employee of the	20	Is Legal -- is, "Legalize You Documents,"	
21	Palestinian Authority?	21	is that a service that you provide through Abu Hbda	
22	A. No.	22	Documentation Services?	
23	Q. Have you ever held a title given to you by	23	A. Yes.	
24	the Palestine Liberation Organization?	24	Q. And can you describe to us what that	
25	A. No.	25	service is exactly? When you say that one of the	

Page 54		Page 55	
1	A. ABU HBDA	1	A. ABU HBDA
2	services you offer is, "Legalize You Documents,"	2	skills are obviously less, you know -- less sharp
3	what do you mean by that?	3	than those of your check translator. In any
4	A. I witness -- I witness -- I witness,	4	event, let me just try to put this question again.
5	and -- and notary -- about the paper of my client	5	Q. When you say, Mr. -- when you say,
6	for the embassy, for the embassies.	6	Mr. Abu Hbda that -- let me -- let me withdraw that
7	Q. Okay. And that -- and which embassies are	7	question.
8	those, sir?	8	Going back to the top of the center of
9	A. Any embassies in the world.	9	Page 2 of Exhibit 4 where it says, "Legalize You
10	Q. Does that include, in any way, any	10	Documents," is it correct, sir, that the service of,
11	embassies with the Palestinian Authority?	11	"Legalize You Documents," involves witnessing and
12	THE INTERPRETER: Could you please repeat,	12	notarizing new signatures on documents?
13	sorry? Excuse me.	13	THE INTERPRETER: Okay.
14	MR. SINAICO: Could the reporter please	14	A. Most of the time, yes. Sometimes there is
15	read back the question?	15	no signature.
16	(Whereupon, the requested portion was read	16	Q. Okay. And when there is no signature,
17	back by the reporter.)	17	what does the process of Legalize You Document
18	Q. When you mentioned, Mr. Abu Hbda, any	18	involve?
19	embassies in the world, does that include any	19	THE INTERPRETER: Okay.
20	embassies that are in any way associated with the	20	A. So, when there is --
21	Palestinian Authority?	21	THE INTERPRETER: Hold on. One.
22	A. For the Palestinian Embassy will ask	22	A. When there is a certificate, a course
23	people to send their paper to the Embassy.	23	certificate, or a Ph.D., or a death certificate, or
24	Q. Okay. So, to go back to the question, the	24	a school certificate, or a divorce, or university
25	answer is, I think what you were saying, sir, is	25	certificate, we -- we -- we don't sign, we -- we
Page 55		Page 57	
1	A. ABU HBDA	1	A. ABU HBDA
2	that the answer to the question is, yes, that the	2	don't sign it. We sign it --
3	documents in question are prepared for use, you	3	THE INTERPRETER: Okay.
4	know, or submission to embassies affiliated in some	4	A. We sign it, and we send it to --
5	way with the Palestinian Authority; is that correct?	5	THE INTERPRETER: Okay.
6	MR. BERGER: Objection, that	6	A. Okay. Either people they will send it to
7	mischaracterizes his testimony.	7	the Embassy, or we send it to the Embassy.
8	Q. Okay. You may answer, Mr. Abu Hbda.	8	Q. Okay. So, that -- the service, "Legalize
9	Actually, I apologize. Let me withdraw the	9	You Documents," as noted at the top of the second
10	question.	10	page of Exhibit 4, can involve you notarizing a
11	You testified a moment ago, Mr. Abu Hbda,	11	signature, correct?
12	that you witness documents for the embassies, and I	12	THE INTERPRETER: Okay.
13	asked you whether that -- the embassies included any	13	A. So, when it's most -- yeah; when it's a
14	embassies that included in any way any embassies	14	paper coming from the Court, or from a -- when it's
15	associated with the Palestinian Authority?	15	a legal paper, or it's a degree. So, we -- we
16	MR. BERGER: Objection; that's not what he	16	consider it as a -- it's something legal. So, we
17	said.	17	consider it as something legal.
18	MR. SINAICO: I'm reading from the	18	Q. Okay. Let me go back to the question,
19	realtime.	19	Mr. Abu Hbda. The question is, does the service of
20	MR. BERGER: You're using the word, "for,"	20	Legalize You Documents noted at the top of the
21	in a way that the translator didn't mean. I could	21	center of Page 2, Exhibit 4 include, in some
22	tell you that because we have a check translator	22	instances, notarizing a signature? That's a simple
23	here.	23	question.
24	MR. SINAICO: I see. I can't say what the	24	THE INTERPRETER: Hold on. I'm sorry.
25	translator knows or doesn't know. My Arabic	25	I'm assume to go step by step because I cannot say

Page 58		Page 60	
1	A. ABU HBDA	1	A. ABU HBDA
2	like that my translation has to be accurate.	2	certificate, or a death certificate, in that
3	A. Okay. Some legal paper doesn't need to	3	instance, you send the -- if the client asks you to
4	be -- doesn't need to be legalized.	4	you send the certificate to an Embassy -- I think
5	Q. Understood, understood. Let me step back	5	you mentioned an Embassy -- and they put a stamp on
6	for a moment, because we're getting a little off	6	it from a foreign government; is that correct?
7	track here.	7	THE INTERPRETER: Could you say it step by
8	In some instances, "Legalize You	8	step.
9	Documents," involves notarizing a signature; is that	9	MR. SINAICO: Okay.
10	correct, sir? This is the service that's noted at	10	THE INTERPRETER: Or I will read it from
11	the top of the page, correct, sir?	11	the transcript.
12	A. If someone has a paper and we have to sign	12	Q. Let me try to ask the question in pieces
13	on it, yes.	13	slowly.
14	Q. Okay.	14	When you are dealing -- instances when
15	A. The person has to sign the front of us,	15	legalizing a document involves legalizing a death
16	yes.	16	certificate; is that correct, Mr. Abu HBDA?
17	MR. SINAICO: I would just note again that	17	A. Yes. Yes, and they will be free, if they
18	Mr. Abu HBDA answered that question in English	18	want to sign it -- if they will sign it or not.
19	over the translator and, you know, in a perfectly	19	Q. Okay. But whether or not the -- whether
20	coherent way. We're going to continue with the	20	or not the client signs the document,
21	translator now, but I am concerned that this is an	21	legalization -- that -- what does legalization of a
22	incredible waste of time, that the translator is	22	document like that entail?
23	acting ineffective here, and it's slowing down the	23	A. The person will go back to the -- to the
24	deposition, but we could then --	24	--
25	Q. New question. Is it correct that service	25	MR. SINAICO: Once again, I'll note that
Page 59		Page 61	
1	A. ABU HBDA	1	A. ABU HBDA
2	of Legalize You Documents sometimes performs you	2	Mr. Abu HBDA is assisting the translator, and
3	witnessing the signature?	3	translating, and speaking perfect English.
4	A. Sometimes, yes, sometimes, no.	4	A. The person will -- will go back to the --
5	Q. Okay. At times, it does, correct?	5	to the place where -- the person will -- will go
6	THE INTERPRETER: Excuse me.	6	back to the place, like whether they will sign it or
7	Q. At times, it does, correct?	7	not, the person will go back to the --
8	A. Yes.	8	THE INTERPRETER: Okay. Excuse me, I will
9	Q. Okay. And at times, "Legalize You	9	translate it.
10	Documents," involves documents that are not signed	10	A. The person will take the paper -- the
11	by your clients; is that correct, sir?	11	person will take the paper.
12	THE INTERPRETER: I'm sorry, I'm just	12	THE INTERPRETER: Okay.
13	reading the question again.	13	A. He will send it back to his home, back
14	Okay.	14	home.
15	A. If it's a legal paper, no. If it's like a	15	THE INTERPRETER: Okay.
16	court, or a divorce, or a deaf -- death.	16	A. And the -- the -- his back home is free to
17	Q. Okay. And in that -- in that instance --	17	accept it, whether accept it or not.
18	When we're talking about a document that	18	Q. And sometimes, Mr. Abu HBDA, you send the
19	is not signed by your client, is it correct, sir,	19	document, correct, rather than your client?
20	that your service involved submitting that document	20	A. If they ask me to do it, yes.
21	to an authority for authentication or certification?	21	Q. Okay. And when you send the document,
22	A. I would send the paper, and they are free	22	what is the purpose of sending the document; what
23	to sign it or not, either sign it or nothing.	23	are you trying to get?
24	Q. Okay. When you're talking about, for	24	A. To be -- to be signed by the -- by the
25	example, authentication, or legalization of a birth	25	embassy, or -- by the embassy or the -- by the

Page 62		Page 64
1	A. ABU HBDA	A. ABU HBDA
2	embassy or the consulate.	affiliated with the Palestinian Authority, correct,
3	Q. To be signed by an official of a foreign	sir?
4	government, correct, or stamp -- let me withdraw	A. I only know that it represent -- it
5	that.	represent Palestinian, Palestinian people.
6	To be signed, or stamped, or -- let me	Q. Okay. Staying on Page 2 of Exhibit 4, do
7	withdraw that. I'm going to try one more time.	you see, sir, that it says, "Passport Services"; do
8	When you send the documents to a foreign	you see that, sir?
9	embassy, the purpose of that is to have them sign	A. Yes.
10	and/or stamp, or certified by an official of a	Q. Okay. And would it be fair to say, sir,
11	foreign government; is that correct?	that, "Passport Services," involves the submission
12	A. They will.	of applications to obtain or renew a passport?
13	THE INTERPRETER: Okay.	A. No.
14	A. They will -- they will sign on the top of	Q. No? Can you describe -- oh, sorry. Can
15	my signature. They're not responsible of the main	you describe what, "Passport Services," means,
16	contain of the paper.	please?
17	Q. Right. But the purpose of submitting the	A. Someone will come with that --
18	document to the foreign embassy is to obtain a	THE INTERPRETER: Hold on.
19	signature or a stamp on the document from an	A. Someone will come --
20	official of the government whose embassy that is; is	THE INTERPRETER: Hold on.
21	that correct?	A. Someone will come --
22	A. Yes; correct.	THE INTERPRETER: Okay.
23	Q. Okay. And one of the places to which you	A. Someone will come with his passport. We
24	submit documents of this nature to get a signature,	will do Power of Attorney from him to someone else.
25	or a certification, or a stamp is the Palestinian	He will sign it in front of me.
Page 63		Page 65
1	A. ABU HBDA	A. ABU HBDA
2	Authority; is that correct?	After that, I will sign it notary, and I
3	A. No.	will give -- I will give it to him, and he will send
4	Q. So, the answer is no, that's not correct?	it to -- he will send it with whatever he wants.
5	A. I don't send to them -- I don't send to	Q. Okay. So, your service, when you say,
6	the -- the Palestinian Authority. I send to people	"Passport Services" -- pardon me.
7	who represent the Palestinian Authority.	When you say, "Passport Services," on your
8	MR. SINAICO: Okay. Once again, I'm going	Website here, Mr. Abu Hbda, the service you provide
9	to note that Mr. Abu Hbda was assisting the	is notarizing a signature on a passport application;
10	translator, and translating his answer into	is that correct?
11	English, and I'm going to go on to my next	THE INTERPRETER: Okay.
12	question, which is --	A. I notarize -- I notarize his signature
13	Q. To the embassy which you send these papers	only. I notarize his signature only.
14	in Canada, you understand that to be an embassy	Q. Okay. So, just to be clear, and to close
15	operated by the Palestinian Authority, correct?	this off, "Passport Services," involves the
16	THE INTERPRETER: Can you please repeat	notarization of passport applicants on passport
17	the question.	applications, correct?
18	MR. SINAICO: Can the court reporter read	A. So, on the Passport Services, there is no
19	the question back, please.	application; there is only Power of Attorney.
20	(Whereupon, the requested portion was read	MR. SINAICO: Okay. I'm going to suggest
21	back by the reporter.)	it's 12:30 now. I'm going to suggest that we take
22	A. Yeah, you -- it was -- it was writing	our lunch break, and we resume at 1:30, if that's
23	that -- it was -- it was writing -- no, the title	okay with everybody.
24	was Palestinian delegation.	MS. KROPF: Okay. That's fine. I don't
25	Q. Okay. You understand that embassy to be	know if we want to have a conversation about the

Page 66		Page 68	
1	A. ABU HBDA	1	A. ABU HBDA
2	translation on the record or off the record.	2	BY MR. SINAIKO:
3	MR. SINAIKO: I guess we could have a	3	Q. Mr. Abu Hdpa, I hope you had a terrific
4	conversation about translation off the record, but	4	lunch. Are you ready to resume?
5	after we have the conversation about translation	5	A. Yes.
6	off the record, we need to have the conversation	6	Q. Do we wait, the translate -- I don't --
7	on the record.	7	maybe you don't need the translator, but if the
8	MS. KROPF: That's fine.	8	translator's here, we should use the translator.
9	MR. SINAIKO: Why don't Mr. Abu Hdpa be	9	A. I'm ready.
10	excused, so he could have his lunch, And Counsel	10	MR. SINAIKO: Okay. Cosette, could we
11	can have the conversation about translation, and	11	bring up -- could we bring up Tab 4, again,
12	we'll plan to resume at 1:34. Actually, you know	12	please?
13	what, I take it back. Let's plan to resume at	13	MS. VINCENT: Yes.
14	1:34.	14	MR. SINAIKO: I'm sorry, I meant Tab 2,
15	THE VIDEOGRAPHER: Okay. We're now off	15	Exhibit 4.
16	the record. The time is 16:34 UTC Time.	16	MS. VINCENT: I got you.
17	(Whereupon, a short recess was taken.)	17	MR. SINAIKO: Done, and done.
18	THE VIDEOGRAPHER: We are now back on the	18	Q. Okay. We're going to stay on Page 2, and
19	record. The time is 17:39 UTC Time.	19	we're going to resume -- we're going to try to run
20	MR. SINAIKO: I will just point out to	20	back over some material we did before where we were
21	everyone on the call, before we resume the	21	having trouble with the translation; is that okay,
22	examination of Mr. Abu Hdpa, that we have a new	22	Mr. Abu Hdpa? Please, if we don't need the
23	translator now. The translator, maybe the new	23	translator, we could excuse him, but if we need the
24	translator could identify himself by name and be	24	translator --
25	sworn by the court reporter.	25	A. Yes, sir.
Page 67		Page 69	
1	A. ABU HBDA	1	A. ABU HBDA
2	THE INTERPRETER: Sure. My name is	2	Q. Okay. Returning to the top of the page.
3	Sadeer; S-A-D-E-E-R; this is the first name. Al,	3	Do you see in the center of the page says, "Legalize
4	A-L, space, Amiri, A-M-I-R-I, and it's written on	4	You Documents"; do you see that, sir?
5	the screen.	5	A. Yes, I see it.
6	- o o o -	6	Q. And, "Legalize You Documents," is one of
7		7	the services that Awni Abu Hdpa Documentation
8	H A D E E R A L A M I R I,	8	Services provides; is that correct?
9	Called as the interpreter in this	9	A. Yes.
10	matter, was duly sworn by a Notary Public to	10	Q. Okay. And can you describe the nature of
11	accurately and faithfully translate the	11	the service, "Legalize You Documents"?
12	questions propounded to the AWNI ABU HBDA	12	A. It's like a notarization, when somebody
13	from English into Arabic, and the answers	13	comes to sign a document, and you witness this
14	given by the AWNI ABU HBDA from Arabic into	14	signature, and you sign it. It's like a notary
15	English.	15	public service.
16	- o o o -	16	Q. Okay. And apart from witnessing or
17		17	notarizing a signature, does, "Legalize You
18		18	Documents," entail any other type of service?
19		19	A. If someone wants to notarization, if he
20		20	wants to send the papers to the embassy to be
21		21	signed, we take the papers and send them to that
22		22	embassy.
23		23	Q. Okay. And the embassies to which you
24		24	sign -- to which you send these papers -- let me
25		25	withdraw that and start again.

Page 70		Page 72	
1	A. ABU HBDA	1	A. ABU HBDA
2	The embassies to which you send these	2	A. Yes, sir.
3	papers, those includes embassies associated with the	3	Q. And you were saying the signature there,
4	Palestinian Authority, or the Palestinian	4	that's your signature; is that correct, sir?
5	association; is that correct, sir?	5	A. Yes.
6	A. It's representative of the Palestinian	6	Q. Do you see the raised seal immediately to
7	population in Canada.	7	the left of your black ink seal?
8	Q. And do you understand that this	8	A. Yes.
9	representative of the Palestinian people in Canada	9	Q. Is that a notarial seal?
10	is in some fashion associated with the Palestinian	10	A. Yes, sir.
11	Liberation Organization or the Palestinian	11	Q. Whose notarial seal was that?
12	Authority?	12	A. For me.
13	A. I don't know the relationship or the rules	13	Q. Okay. And do you see that there are a
14	in that country. All I know is that it's a	14	number of other stamps on this document? There's a
15	representative of the Palestinian application in	15	stamp -- let me withdraw that.
16	Canada and it documents or certify documents.	16	Do you see there's a stamp in blue ink,
17	Q. Thank you, Mr. Abu Hbda.	17	and there's a stamp in red ink on this document?
18	MR. SINAICO: Let's mark as our next	18	A. Exactly, yes.
19	Exhibit a 55-page document that is titled on the	19	Q. And, sir, is this an example of a document
20	front page, "Declaration of C. Russell."	20	that Awni Abu Hbda Documentation Services legalized?
21	This is Tab 10C. Cosette, could you bring	21	A. It maybe like -- certificates, graduation
22	it up, please?	22	certificates, death certificates, authorization.
23	MS. VINCENT: It will be up shortly.	23	Yes, this is one of them; yes, maybe.
24	(Whereupon, Declaration of C. Russell was	24	Q. Okay. And are you able to read the blue
25	marked as Exhibit 5 for identification, as of	25	ink stamp?
Page 71		Page 73	
1	A. ABU HBDA	1	A. ABU HBDA
2	April 7th, 2021.)	2	MR. SINAICO: Cosette, could you zoom in
3	A. Yes, sir.	3	on the blue ink stamp, please.
4	Q. And, specifically, we're going to turn to	4	Q. Is that okay, Mr. Hbda. Can you see it?
5	Page 52 of the document.	5	A. It says, "General Palestinian Delegation
6	MR. SINAICO: Page --	6	Canada."
7	MS. VINCENT: Yeah, I'm going to have to	7	Q. Okay. And is that the office in Canada to
8	exit out of there as quick as possible. I'll	8	which you emailed documents when you want them
9	share my screen in a moment.	9	legalized?
10	MR. SINAICO: Can we rotate that around,	10	A. Yes, sir.
11	so Mr. Abu Hbda could see that more clearly?	11	Q. And now, let's look at the red ink stamp.
12	MS. VINCENT: I'll rotate it. One moment.	12	Can you read the red ink stamp, sir?
13	Q. Can you see the page that we're focusing	13	A. Not all of it.
14	on from Exhibit 5, Mr. Abu Hbda?	14	Q. Okay. Are you familiar with that stamp,
15	A. Yes, I do.	15	sir?
16	Q. Okay. And do you recognize that this is a	16	A. Yes, I've seen stamps like this.
17	document that you've seen before, sir?	17	Q. So, although you're unable to read the
18	A. Yes, I do.	18	stamp in its entirety, can you read the portions of
19	Q. Okay. And do you see that there's a stamp	19	it that you are able to read?
20	in black ink in the upper left-hand corner, and a	20	MR. SINAICO: Let the record reflect that
21	raised seal, and the stamp in black ink says, "Abu	21	Mr. Abu Hbda translated the red ink stamp to the
22	Hbda"; do you see that, sir?	22	best he was able to --
23	A. Yes, I do.	23	A. It says the a Palestinian delegation
24	Q. And the stamp in black ink, that's your	24	legalized this document, but it doesn't confirm the
25	notarial stamp; is that correct, sir?	25	contents or the information inside this document.

Page 74		Page 76
1	A. ABU HBDA	
2	It's not responsible for the content inside this	looking at the wrong document. I want to look at
3	document.	Tab 2, which is also Exhibit 4.
4	Q. And you can see inside, Mr. Abu Hbda, do	MS. VINCENT: Sorry.
5	you see that there is a blue ink signature inside	MR. SINAJKO: It's okay. Take your time.
6	the red ink stamp?	Bear with us for just a moment, Mr. Abu
7	A. Yes.	Hbda.
8	Q. And are you able to tell us whose	There we go. Back to Page 2.
9	signature that is?	Q. Okay. Now, underneath, "Legalize You
10	A. To be honest, I don't know whose signature	Documents," you see that there are a number of
11	is that.	different types of -- there are a number of
12	Q. Okay. And this stamp, is this a stamp	different entities on that page?
13	that's typically -- let me withdraw the question and	A. Yes.
14	try again.	Q. Okay. The first one is, "Awni Abu Hbda
15	Is this red ink stamp a stamp that	Service Registration Form"; do you see that?
16	typically appears on documents that you have	A. Yes.
17	legalized for your clients?	Q. Can you tell us what that is.
18	A. Not all the documents, no.	A. This is registering a client. If someone
19	Q. Do you have any understanding as to which	comes to my office, I register his office or enter
20	types of documents this red ink stamp would appear	his name in a book.
21	on and which not?	Q. Ah. Is that a book where you record your
22	A. I'm not sure, but I think maybe it's the	notarial act, sir?
23	certificates that has this red ink stamp, while	A. It's a regular page. I don't see -- of
24	other documents, they don't have this stamp.	this pages it changes day by day.
25	Q. Okay. And do you have any understanding	Q. Got it. But, this service registration
Page 75		Page 77
1	A. ABU HBDA	
2	as to who placed the red ink stamp on this document?	A. ABU HBDA
3	A. The council, or the delegation of both the	form, this is not a document you would legalize?
4	council.	This is a piece of paper you have your clients
5	Q. And that's a person in this office in	complete, so you could provide services to them; is
6	Canada that you mentioned earlier, this delegation	that correct?
7	office to which you mail papers, which you would	A. Correct.
8	like papers legalized for your clients, correct?	Q. Okay. Going back up to Legalize You
9	A. This is what this supposed to be.	Documents for one moment. What do you typically
10	Q. Okay. But just to clarify, my question	charge clients to Legalize You Documents for them?
11	was the office where that stamp was applied was the	A. If it's only notary public, I charge from
12	office -- as you understand it, the office where	five to 15 to 20; this is only if it's notary
13	that stamp was applied was the office in Canada to	public.
14	which you send documents when your clients asked you	Q. Right. And if they're -- in the instances
15	to have them legalized; is that correct?	where you're asked to legalize a document by
16	A. Yes.	transmitting it to this office in Canada, what do
17	Q. Okie doke.	you charge clients to do that?
18	MR. SINAJKO: Now, let's go back for a	A. So, the service includes the postage that
19	moment to Exhibit 4. Okay. Now, Cosette, we're	we use to send it, the fees that they charge us, and
20	getting Exhibit 4 back up.	the preventative to cancel it, and our fees. So, it
21	MS. VINCENT: Yes, we are.	ranges from 250 to 300. Again, this includes the
22	MR. SINAJKO: Okay. And let's turn to	postage, and includes the money postage. We -- the
23	Page 2 for Mr. Abu Hbda.	money order to pay for the fees that we -- council
24	MS. VINCENT: Is this the page you want?	charges, or that office charges, plus our fees to
25	MR. SINAJKO: I'm sorry, I think we're	legalize the document. The total is between \$250
		and \$300 in total.

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1	A. ABU HBDA	1	A. ABU HBDA
2	Q. And Mr. Abu HBDA, what does your business	2	A. Yes, sir. No.
3	charge -- let me withdraw that question and ask it	3	Q. Okay. Do the Passport Services that your
4	more crisply.	4	company provide, or -- withdrawn.
5	Mr. HBDA -- I'm going to try one more time	5	Do the Passport Services that your
6	here.	6	business provides relate in any way to passports
7	Mr. Abu HBDA, what is your fee, putting	7	issued by the Palestinian Authority, or the
8	aside the fees for postage, and fees charged by the	8	Palestinian Liberation Authority, to the extent such
9	council, whatever you charge, what is your fee that	9	exist?
10	you charge for the document?	10	A. We write an authorization between two
11	A. Between \$50 to \$100.	11	persons; one person here and one person in
12	Q. And how frequently would you say -- well,	12	Palestinian. This has no relation to the PLO, or
13	let's just -- let me withdraw that question and try	13	the organization; it's two persons.
14	again.	14	Q. What is the nature of this authorization
15	How frequently would you say that you send	15	that you're talking about?
16	documents to this office in Canada that we've been	16	A. It gives authorization to this person to
17	talking about, this delegation of the Palestinian	17	renew the passport for that other person. We just
18	people that you mentioned; how frequently would you	18	notarized this document.
19	say that you send documents to that office that --	19	Q. I see. Is this a document that's issued
20	to be legalized?	20	by the Palestinian Authority, and that you assist
21	A. It may be once a week or maybe every day;	21	one of your customers in executing?
22	it's variable. It depends on the people.	22	A. No, most of the time we write it. It's a
23	Q. So, would it be fair to say that over the	23	handwritten. This person authorizes that person to
24	last year, you've done that at least 50 times?	24	do the renew; that's it.
25	A. I don't have the number. I cannot tell.	25	Q. And is there a prescribed form of words
Page 79		Page 81	
1	A. ABU HBDA	1	A. ABU HBDA
2	Q. Okay. So, ballpark, you're not prepared	2	that that document needs to include in order to be
3	to say you did it at least 50 times over the last	3	legally valued?
4	year?	4	A. No, to accept another person to renew the
5	A. I don't know. To be honest, I'm not sure.	5	passport, they accept any notarize document, only in
6	Q. But you'd say --	6	America, not only for me, but in the whole state in
7	Well, just to go back to what you said	7	America.
8	before. You'd say that you do it several times a	8	Q. Right. And are these documents that are
9	month; is that correct, sir?	9	used to apply for or renew passports issued by the
10	A. Maybe more. I don't know.	10	Palestinian Authority or the Palestinian Liberation
11	Q. Okay. Let's go down to a few stops on the	11	Organization?
12	document. Do you see that it says, "Passport	12	A. No, these are the Palestinian passports.
13	Services"?	13	Q. Right. So, is it -- how -- well, let me
14	A. This is in total.	14	withdraw that.
15	THE INTERPRETER: I will repeat the	15	How do you understand --
16	question. It seems he did not hear it.	16	After you prepare and understand and
17	MR. SINAIKO: Okay. Go ahead.	17	notarize one of these documents, how do you
18	A. Yes, sir.	18	understand that your clients utilize these
19	Q. And can you tell me, does, "Passport	19	documents; in other words, what do they do with
20	Services," include -- well, withdrawn.	20	them?
21	The Passport Services that your company	21	A. He sends these documents by FedEx to the
22	provides, does that include the transmission of	22	other person, and after this leaves my office, I
23	documents to the office in Canada that we've been	23	don't know what happens to him. I don't know
24	talking about, the delegation of the Palestinian	24	anything about him after he leaves.
25	people, as you describe it?	25	Q. Okay. And this passport service that you

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1	A. ABU HBDA	A. ABU HBDA
2	perform in connection with passports by the	Authority ever explained to you any aspect of the
3	Palestinian Authority, how long have you been	process of the issuance or renewal of a passport by
4	performing that service?	the Palestinian Authority?
5	A. I don't know to be honest. I've been	5. A. No.
6	notarizing papers for customers for long time, but I	6. Q. Okay. And these Passport Services that
7	don't have an idea of how long exactly.	7. you provide that are referenced on Page 2 of Exhibit
8	Q. Would you say it's been at least five	8. 4, have you ever performed those Passport Services
9	years?	9. in connection with the issuance or renewal of a
10	A. Maybe. It may be five, it may be seven,	10. passport, other than by the Palestinian Authority?
11	it may be more. I don't know.	11. A. Yes, there is. I performed services for
12	Q. Okay. The preparation of these documents	12. passports to travel to Jordan, and, also, for the
13	is important in order for a person in the United	13. Egyptian government. So, anyone who come requesting
14	States to be able to obtain or renew a passport	14. this service, I file the form for him or for her.
15	issued by the Palestinian Authority; is that	15. Q. Okay. Let's move down to, "Family
16	correct?	16. Matters"; do you see that, Mr. Abu Hbda?
17	A. Correct.	17. A. Yes, sir.
18	Q. And did there come a time when you learned	18. Q. Can you describe that service to us,
19	how to prepare these documents, so that they would	19. please.
20	be legally effective when presented to these	20. A. So, if two people fight at home, like a
21	authorities, you know, were presented to the	21. husband and a wife, I try to solve the issue between
22	Palestinian Authority?	22. them, and if there's another issue, like a daughter
23	A. Sometimes --	23. with her father, or a family member with another
24	THE INTERPRETER: I'm sorry.	24. family member for the Palestinian population, I come
25	A. Sometimes customers bring all of the form	25. and try to solve the issue for them.
Page 83		Page 85
1	A. ABU HBDA	A. ABU HBDA
2	papers written and sent to them from my home	2. Q. Got it. And so is that a service that
3	country, and they wanted to be notarized.	3. falls within the category of legalization of
4	Q. Right, but you mentioned -- thank you very	4. documents?
5	much.	5. A. Yeah, sometimes -- thank you. Sometimes
6	You mentioned before, Mr. Abu Hbda, that	6. they have written documents, or have filed claims
7	sometimes you prepared the document, right?	7. against each other, and through each of them, and
8	Sometimes you prepared the document that has to be	8. then they come, and the issue solve them; they try
9	notarized and then returned to the Palestinian	9. to discharge the claim, dissolve the claim, and they
10	Authority, correct?	10. write the paper, and I notarize this paper.
11	A. Correct.	11. Q. And that's a service that you provide as a
12	Q. Okay. How did you learn the proper	12. Notary Public of the State of New Jersey; is that
13	wording to put in these documents, so that when	13. correct?
14	presented to the Palestinian Authority, the	14. A. It is a service that I provide for the
15	documents would have the desired effect?	15. population, the Palestinian population, to solve the
16	A. We made copies from the papers that were	16. issues or the altercations between the persons.
17	brought to us and then we started using them.	17. Q. And you know to whom these documents you
18	Q. Okay. Have you ever familiarized yourself	18. note relating to Family Matters are submitted by
19	for the legal requirements for the issuance or	19. your customers?
20	renewal of a passport by the Palestinian Authority?	20. A. I give it to the person responsible, and
21	A. I know that from the people who come,	21. he submits it to the Court to discharge or resolve
22	these people have spoken with the people who they	22. the claim after they drop the case, and all these
23	want to authorize, and they gave -- they give them	23. services are free, just to clarify. I don't get any
24	the information.	24. payment for these services; I provide it for free.
25	Q. Has any representative of the Palestinian	25. Q. Excellent. And these services are with

Page 90		Page 92
1	A. ABU HBDA	
2	Palestinian Liberation Authority; is that correct?	1 maybe. In Canada.
3	A. I don't know. I don't know.	2 Q. Is Canada the same office that we were
4	Q. Okay. Okay. Let's move down to the next	3 talking about before, correct, sir?
5	item on this page. It says, "Trade Certification."	4 MR. SINAJKO: Let the record reflect that
6	can you tell us -- can you tell us what service that	5 Mr. Abu Hbda answered the question in English,
7	involves?	6 before the translation came.
8	A. I haven't done any of this; none.	7 Q. Sir, have you ever had personal authority
9	Q. Okay. Can you describe the nature of this	8 to provide certification of a document on behalf of
10	service, whether or not you've actually performed	9 the Palestinian Authority?
11	it?	10 A. No.
12	A. Maybe it involves registering a company in	11 Q. Have you ever personally had the authority
13	New Jersey.	12 to certify any document on behalf of the Palestine
14	Q. Okay. Does it involve registering any	13 Liberation Organization?
15	companies or businesses outside of the United	14 A. No.
16	States?	15 Q. Okay. In connection with the documents
17	A. No, I haven't done none -- neither inside,	16 that you submit to an office in Canada that we've
18	nor outside the States. I didn't do any of them.	17 been talking about, I believe you mentioned that the
19	Q. Okay. Let's go down to the next one,	18 office in Canada charges some sort of a fee; is
20	"Academic Record Certification"; can you describe	19 that -- do you recall that?
21	that service for me, please?	20 A. Yes.
22	A. This is a service where if a doctor	21 Q. Okay. And you, you know --
23	graduates from a university, or a hospital, or a	22 Again, do you remember that you told us
24	program, we certify this degree for this person to	23 before that you also -- you also collect a fee from
25	be able to work in other countries back in Jordan,	24 the customer yourself?
Page 91		Page 93
1	A. ABU HBDA	
2	Palestinian, Lebanon. So, he brings this documents,	1 A. ABU HBDA
3	and we certify this document, so that he can work in	2 A. Correct.
4	these other countries.	3 Q. Has there ever been a circumstance in
5	Q. And when you say you certify the document,	4 which the office in Canada, to which you sent
6	what do you mean by that?	5 documents, has shared a portion of its fee with you?
7	A. We send it to the embassy of the country	6 A. No.
8	that he's entering into.	7 Q. Have you ever asked -- let me withdraw
9	Q. Okay. So, this would be -- and just to,	8 that question. It's an inartful question.
10	you know, go back to the document, if we need to,	9 Have you ever asked that the office in
11	and let me know if you'd like to go back to the	10 Canada, to which you've been submitting documents,
12	document, but I'm thinking, is this a service	11 as we've been discussing, to share its fee with you?
13	similar to the service that you performed with	12 A. No.
14	respect to, you know, the document that had the red	13 Q. Is the office in Canada to which you
15	and blue stamps that we were looking at before?	14 submit documents aware that you charge a fee to your
16	A. Approximately, yes. It's similar. It's	15 customers for making these submissions on their
17	the same thing.	16 behalf?
18	Q. Okay. And that's the service that you	17 MR. BERGER: Objection, calls for
19	could perform just to get records certified by the	18 speculation.
20	Palestinian Authority or the Palestinian Liberation	19 Q. To your knowledge?
21	Authority, correct; Palestinian Liberation	20 A. I'm sorry, could you repeat the question.
22	Organization?	21 Q. Let me rephrase the question. To your
23	A. No, it's not -- neither from the	22 knowledge, is the -- are the -- is the office in
24	Palestinian government, no. The Liberation, the	23 Canada that we've been talking about aware that when
25	Liberation, it's from the office in Washington,	24 you submit documents to them for certification, you
		25 are collecting a fee for your customers?

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<p style="text-align: center;">A. ABU HBDA</p> <p>1 A. For my fee -- for my fees. Why are they 2 concerned with my fees?</p> <p>4 Q. Okay. Let's get the question read back.</p> <p>5 MR. SINAICO: I would like to just have 6 the question read back because I think the 7 question was pretty clear, and we should just get 8 an answer to it. I think -- could we just ask the 9 question of Mr. Abu HBDA again.</p> <p>10 THE INTERPRETER: Sure.</p> <p>11 (Whereupon, the requested portion was read 12 back by the reporter.)</p> <p>13 A. They are not concerned because why are 14 they concerned with my fees? They -- the customers 15 bring a money order for the fees that the office 16 charges from, and then I will speak with the 17 customer, and they pay me my fees. So, this -- 18 these are two separate things. Why are they 19 involved with my fees? These fees go to a money 20 order.</p> <p>21 Q. I'm going to try the question again.</p> <p>22 To your knowledge, is the office in Canada 23 to which you submit documents --</p> <p>24 This office in Canada we've been 25 discussing; is the office in Canada aware that you</p>	<p style="text-align: center;">A. ABU HBDA</p> <p>1 which you send documents to be certified or 2 legalized?</p> <p>4 A. No, like in situations where the papers 5 takes a long time, you call and leave a message. 6 You don't speak with anybody personally and they 7 don't pick up the phone.</p> <p>8 Q. Okay. Putting aside oral communications, 9 have you ever communicated in writing with anybody 10 in this office in Canada that we've been discussing?</p> <p>11 A. No.</p> <p>12 Q. Okay. Let's go down two stops -- we're 13 still on Page 2 of Exhibit 4. Let's go down two 14 stops to, "Power of Attorney"; do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Can you describe that service for us?</p> <p>17 A. So, this document special for Palestinians 18 who want to give Powers of Attorney, or authorize 19 people; example either registering a land, either 20 divorce in the court of the legal court, or doing 21 something where they cannot go to the home country, 22 they authorize or give the Powers of Attorney to 23 another person over there to do that.</p> <p>24 Q. And these are Powers of Attorney that are 25 used in areas under control of the Palestinian</p>	<p style="text-align: center;">A. ABU HBDA</p> <p>1 Authority, to your understanding; is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. And do you prepare these documents, or are 5 they prepared by somebody else, and you just 6 notarize the signatures?</p> <p>7 A. Most of the people bring this completed 8 document for attorneys in my home country, and we 9 just notarize them. They sign these papers in front 10 of us. We sign and notarize it.</p> <p>11 Q. And do you ever submit these Powers of 12 Attorney to, you know, to the office in Canada, or 13 to any other office that you might understand to be 14 affiliated with the Palestinian Authority, or the 15 Palestinian Liberation Organization?</p> <p>16 A. Sure. So, after this person signs it, I 17 sign it and notarize it. We give it to that person, 18 and give them the address and contact information 19 for the counsel, or the litigant in Canada, and tell 20 him that you have to have a money order, and you 21 have to send it there, and most people do it.</p> <p>22 Some people tell us that they don't know 23 how to do it, and they need us to do it for them. 24 So, again, we do this by having the money order, and 25 sending it by FedEx to the office in Canada. So,</p>

		Page 98	Page 100
1		A. ABU HBDA	A. ABU HBDA
2	it's either or.		registered in that person's name who wants to sell
3	Q. Okay. Let's jump down one more stop here,		it to make sure that he owns it.
4	and do you see Mr. Abu Hbda that it says, "Land and		Q. Okay. And is that a procedure that's
5	Property Transaction"?		required by the -- by laws or regulations of the
6	A. Yes, sir.		Palestinian Authority?
7	Q. Can you describe this service that's		A. No, it's something that to make sure that
8	reflected there?		the person who's buying the land is protected, and
9	A. So, this is similar to the authorization I		really the land is in the name of the seller. It's
10	spoke about, like if someone wants to sell a land,		not required by the government.
11	or construe the land in my home country, they bring		Q. Ah, and how did you learn of the existence
12	the papers and they sign it in front of us, and we		of this office where you send the emails?
13	notarize it, and we send it to Canada, but before		A. I think the office in Canada sent us an
14	that, we have to send them email to the office of		email saying you have to email the office in
15	Land and Corporate in Ramallah, and we get a		Ramallah, and the office in Ramallah will get in
16	response, and then the communication will directly		contact with them.
17	between Canada, the office in Canada and this office		Q. And how did you come to receive that email
18	in Ramallah.		from the office in Canada?
19	Q. Okay. Terrific.		A. Honestly, I don't remember if it came as
20	MR. SINAICO: We've been going for an hour		an email or a message. I don't remember.
21	and ten minutes. Would it be all right if we took		Q. Whether it was an email, or a message, my
22	a short break?		question is, do you recall how you came to receive
23	THE INTERPRETER: I want to continue		that communication from the office in Canada,
24	because I don't have time.		whether it was either in written or oral form?
25	MR. SINAICO: Well, with apologies, I		A. I don't remember exactly the incident. I
		Page 99	Page 101
1		A. ABU HBDA	A. ABU HBDA
2	actually need to take a break for three minutes.		don't remember.
3	We could stay on the record, if you want. I just		Q. Let's look at one more thing on Page 2
4	need to get up for three minutes and I'll be right		here. It says -- you see it says, "All Arab Nations
5	back.		Documents Certification"?
6	THE INTERPRETER: Let's make it five		A. It's the same, doing certifications,
7	minutes.		certificate, or -- sorry, authorization --
8	MR. SINAICO: Take five. Let's go off the		THE INTERPRETER: Delete that --
9	record for five minutes. We'll come back at 2:52.		A. -- doing authorization. Doing same thing
10	THE INTERPRETER: Thank you, sir.		we were doing, like if someone comes from Jordan, we
11	THE VIDEOGRAPHER: Okay. We are now off		do notarization from Jordan. If someone comes to do
12	the record at 18:47 UTC Time.		notarization from the Gulf countries, or Egypt, or
13	(Whereupon, a short recess was taken.)		Yemen, or Israel. So, it's the same. It's just
14	THE VIDEOGRAPHER: We are now back on the		doing notarizations for other countries.
15	record. The time is 18:53 UTC time.		Q. Authorizations of what sort?
16	Q. Mr. Abu Hbda, you mentioned a moment ago,		A. Notarization.
17	in connection with land and property transactions on		Q. Notarization. Got it. I'm so sorry.
18	this page, Page 2 of Exhibit 4, that there are times		Maybe I misheard. Okay.
19	where you need to communicate by email with an		So, just to be clear, I want to make sure
20	office in Ramallah; do you recall mentioning that?		it's notarization, by you as a Notary Public of the
21	A. I just send the email. I don't speak with		State of New Jersey, of a documentation to a foreign
22	anyone.		government?
23	Q. Understood, but what is the purpose of		A. Correct.
24	these emails?		Q. A foreign government, or the Palestinian
25	A. Just to inspect that the land is really		Liberation

	Page 102	Page 104
1	A. ABU HBDA	
2	Organization, right?	you communicated orally with any person you
3	A. No, I didn't say that. I said other	understood to be an officer, or an agent, or
4	foreign governments. I didn't say Palestinian	employee, or in any way affiliated with this office
5	government. I didn't say the Palestinian Liberation	in Canada that -- that we've been discussing, the
6	Organization. Yes, other government; this is what I	office to which you submit documents when you would
7	said.	like them to be legalized by the Palestinian
8	Q. Okay. So, all Arab nations document	Authority?
9	certification does not -- that service that your	A. No.
10	company performs does not in any way involve the	Q. And since you received the Subpoena, have
11	Palestinian Authority, or the Palestinian Liberation	you communicated in writing, including by email,
12	Organization, correct?	with any person you understand to be an officer, or
13	A. I'm a New Jersey Notary. I notarize	an agent, or an employee, or in any way affiliate
14	papers to people, and they send it wherever they	with the Palestinian Authority?
15	want to. This doesn't change anything for me.	A. No.
16	Q. Understood. So, they -- I mean, they	Q. And since you received the Subpoena, have
17	could be documents used for any purpose? It's a	you communicated in writing, including via email,
18	documentation for notarization purposes; is that	with any person you understood to be about officer,
19	right?	or an agent, or an employee or in any way affiliated
20	A. Yes, I -- I'm just a New Jersey Notary,	with the Palestinian Liberation Organization?
21	and that's all. I just notarize the documents in	A. No.
22	New Jersey; that's all.	Q. Okay. And since you received the
23	Q. Very good. Okay. I want to go back to a	Subpoena, have you communicated in writing with any
24	topic that we discussed briefly earlier. I'm going	person of your understanding to be an officer, or an
25	to try to come back to it. Subsequent to	agent, or an employee, or any way affiliated with
	Page 103	Page 105
1	A. ABU HBDA	A. ABU HBDA
2	receiving -- well, let me withdraw that.	this office in Canada, which we've been discussing,
3	Do you remember, Mr. Abu Hbda, that	to which you authorized notarization of
4	earlier today, we looked at one of the Subpoenas	documentation you submit to the Palestinian
5	that you were served with; do you recall that?	Authority?
6	A. Yes.	A. No.
7	Q. Okay. To your recollection -- and by the	Q. Okay. To your knowledge -- well, let me
8	way, let's just --	withdraw that. Start again.
9	I mean, we could confirm it, but the	The question I'm about to ask you is based
10	Subpoena was served on you. Hang on one second --	on your personal knowledge. To your personal
11	the Subpoena was served on you around March 11th;	knowledge and, you know, in advance of today, was
12	does that sound right, sir?	any person who you understand to be an agent, or an
13	A. Correct.	employee, or an officer, or somehow affiliated with
14	Q. Since you received the Subpoena, have you	the Palestinian Liberation Organization, aware of
15	communicated orally with any person you understood	you were being served with a subpoena?
16	to be an officer, agent, or employee, or in any way	A. I haven't told anybody about that, no.
17	related to the Palestinian Authority?	Q. Okay. But to your --
18	A. No.	Putting aside whether you told anybody or
19	Q. And since you received the Subpoena, have	not, to your knowledge, are any such people aware
20	you communicated orally with any person you	of?
21	understood to be an officer, or agent, or employee,	A. How would I know? I haven't spoken with
22	or in any way related to the Palestinian Liberation	anybody.
23	Organization?	Q. So --
24	A. No.	A. But I don't know. How would I know if
25	Q. And since you received the Subpoena, have	anybody knows?

		Page 106	Page 108
1		A. ABU HBDA	
2		Q. To your knowledge, you're not aware of	1 Q. And what is that address?
3		that? That's all I'm asking.	3 A. This is my address.
4		A. I don't know. I don't know anything.	4 Q. Your address. Is that a home address?
5		Q. Okay. And to your knowledge, again, just	5 A. No.
6		your personal knowledge, and in advance of today,	6 Q. Okay. What kind of an address is that?
7		was any person who you understand to be an agent, or	7 Is that the address where your business is located?
8		an employee, or an officer, or otherwise affiliated	8 A. Yes, this is the office; yes.
9		with the Palestinian Authority aware of the Subpoena	9 Q. Okay. How long has the office of your
10		that was served on you in connection with today's	10 business been at that location?
11		deposition?	11 A. I don't remember exactly, maybe two years.
12		A. No, I don't know. I don't know.	12 I don't remember exactly.
13		Q. So, the answer is -- I mean, I just want	13 Q. All right.
14		to confirm that I understood correctly.	14 MR. SINAICO: Cosette, can we get Exhibit
15		To your knowledge, you are not aware of	15 5 again, please? I think that was Tab 10.
16		any such person being knowledgeable about the fact	16 MS. VINCENT: Tab 10.
17		that you were served with the Subpoena?	17 MR. SINAICO: But, I think we marked it as
18		A. For me, I didn't tell anybody.	18 Exhibit 5.
19		Q. Right. But that, again, I just want to be	19 MS. VINCENT: So, which page?
20		clear; you're not aware of any such person knowing	20 MR. SINAICO: So, we're going to go to
21		whether you told them or not?	21 Page 36 of the PDF. Actually, it has a number in
22		A. God only knows. Am I God? I don't know.	22 the lower right-hand; 296.
23		How would I know.	23 MS. VINCENT: Maybe it should be up.
24		Q. Okay. And one last question in this line.	24 MR. SINAICO: Yeah, that looks right. Can
25		To your knowledge, in advance of today, was any	25 we zoom?
		Page 107	Page 109
1		A. ABU HBDA	
2		person who is an employee, or agent, or officer, or	1 A. ABU HBDA
3		otherwise affiliated with this office in Canada that	2 Actually, let me ask Mr. Abu Hbda.
4		we've been talking about, where you submit documents	3 Q. Have you seen this page before? Do you
5		for, you know, certification or authentication of	4 recognize it? Anything you want to see, let us
6		documents by the Palestinian Liberation Authority,	5 know, and we could move the pages around for you.
7		were any of those people, to your knowledge, aware	6 Whatever you'd like us to do, we'll do.
8		that you were served with the Subpoena?	7 A. No, I haven't seen it.
9		A. I don't know.	8 Q. Okay.
10		Q. Okay. Not -- so, to your knowledge, the	9 MR. SINAICO: Cosette, can you zoom in the
11		answer is no; is that correct?	10 upper left-hand logo in the corner.
12		A. I don't know. I don't know anything. I	11 Q. Do you see the logo, Mr. Abu Hbda?
13		don't know.	12 A. Yeah.
14		Q. Okay. By the way, your business -- let's	13 Q. Okay. Do you see it says, "PLO General
15		go to the last page of Exhibit -- I guess this is	14 Delegations to the United States"?
16		Exhibit 4.	15 MR. SINAICO: Can we make it any larger?
17		MR. SINAICO: Cosette, can we zoom in on	16 I know it's -- I'm having a hard time seeing it
18		the thumbtack, please? There we go. Let's zoom	17 to. There we go. Might be better.
19		in on that.	18 Q. Does that make it easier? Can you see the
20		Q. Mr. Abu Hbda, do you see the thumbtack	19 logo, Mr. Abu Hbda?
21		that we zoomed in on here on Exhibit 4?	20 A. Why.
22		A. Yes, sir.	21 Q. Do you see that it says, "General
23		Q. Okay. And you see there's an address	22 Delegation to the United States"?
24		there, 964 Main Street, in Paterson, New Jersey?	23 A. Yes.
25		A. Yes.	24 Q. Do you have an understanding of what the
			25 PLO General Delegation to the United States is or

	Page 110	Page 112
1	A. ABU HBDA	A. ABU HBDA
2	<p>was?</p> <p>3 A. Yes.</p> <p>4 Q. And what do you understand that the PLO</p> <p>5 General Delegations of the United States is or was?</p> <p>6 A. It is a representative of Palestinian</p> <p>7 Authority.</p> <p>8 Q. Okay. And is that an analogue, or a</p> <p>9 former analogue in the United States to the office</p> <p>10 in Canada that we've been talking about?</p> <p>11 A. I don't know because I've never seen this</p> <p>12 page. This is the first time I've seen it.</p> <p>13 Q. Okay. But putting aside the web page, and</p> <p>14 whether you've seen it or not, do you have -- were</p> <p>15 you aware of what the general PLO delegation to the</p> <p>16 United States was?</p> <p>17 A. It used to have the Palestinian Authority</p> <p>18 for the documents and papers.</p> <p>19 Q. Right.</p> <p>20 A. Something --</p> <p>21 Q. And in that respect, did this office</p> <p>22 perform a bunch in -- similar to the one that is</p> <p>23 performed by this office in Canada that you deal</p> <p>24 with on behalf of your clients, who are looking to</p> <p>25 have documents legalized or certified by the</p>	<p>1 A. ABU HBDA</p> <p>2 A. Yes, sir.</p> <p>3 Q. Okay. And you see that the box in the</p> <p>4 upper left-hand corner says, "General Powers of</p> <p>5 Attorneys"; do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. That's a service that is also provided by</p> <p>8 Awni Abu Hbda Documentation Services, correct?</p> <p>9 A. I notarize it as a -- as a notary; yes.</p> <p>10 Q. Okay. And you see in the -- in the center</p> <p>11 on the top there, it says, "Durable Land Power of</p> <p>12 Attorney"; do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. And that's also a service that Awni Abu</p> <p>15 Hbda Documentation Services provides in connection</p> <p>16 with the Palestinian Authority, correct?</p> <p>17 A. I do it -- I notarize it as a notary</p> <p>18 public; yes.</p> <p>19 Q. Okay.</p> <p>20 MR. SINAJKO: Cosette, let's go to Page --</p> <p>21 I guess it's Page 42 of the PDF.</p> <p>22 MS. VINCENT: Sure; sure thing.</p> <p>23 Q. Mr. Abu Hbda, this -- just to be clear,</p> <p>24 this is another page of the Exhibit that we have</p> <p>25 been looking at.</p>
1	A. ABU HBDA	Page 113
2	<p>Palestinian Authority?</p> <p>3 A. Yes, they were authenticating the papers,</p> <p>4 notarizing the paper; yes.</p> <p>5 Q. And while that office was in existence,</p> <p>6 was it part of your business at Awni Abu Hbda</p> <p>7 Documentation Services for certifications or</p> <p>8 legalization of this office PLO General Delegation</p> <p>9 to the United States?</p> <p>10 A. Most of the people from New Jersey, and</p> <p>11 New Jersey when we used to notarize the papers, they</p> <p>12 go by themselves; they go in person to that office.</p> <p>13 Q. I'm not sure I understand that exactly.</p> <p>14 Do you mean they would go to the office, PLO General</p> <p>15 Delegation to the United States?</p> <p>16 A. Yes, sir; yes.</p> <p>17 Q. Okay.</p> <p>18 MR. SINAJKO: Cosette, let's zoom out.</p> <p>19 Okay.</p> <p>20 Q. Do you see this page is titled, "Conular</p> <p>21 Affairs"?</p> <p>22 A. Yes.</p> <p>23 Q. When you see underneath that on the</p> <p>24 upper -- there are one, two, three and four, five,</p> <p>25 six boxes there; do you see that?</p>	<p>1 A. ABU HBDA</p> <p>2 A. I see that was Page 42, correct?</p> <p>3 MR. SINAJKO: It's Page 42 of the PDF; 42</p> <p>4 out of 55; correct, Cosette?</p> <p>5 MS. VINCENT: It should be shared.</p> <p>6 MR. SINAJKO: That's it.</p> <p>7 Q. Okay. Mr. Abu Hbda, do you see that page</p> <p>8 that's got, "A302," in the lower right-hand corner?</p> <p>9 A. Yes.</p> <p>10 Q. And you see it says, "Notary Publics"?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And do you see that -- I guess it</p> <p>13 says, "Notary Publics," in the upper left-hand logo?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And then it says, "Notary Publics,"</p> <p>16 again in the middle of the page. I guess -- there's</p> <p>17 a paragraph, and then to the right, it says, "Notary</p> <p>18 Publics," again; can you see that?</p> <p>19 MR. SINAJKO: Sorry. Can we enlarge that</p> <p>20 for Mr. Abu Hbda?</p> <p>21 Q. Does that help? Okay. And do you see</p> <p>22 that there are a number of cities listed there?</p> <p>23 Okay. And do you see that one of them is</p> <p>24 Paterson?</p> <p>25 A. Yes, I see it.</p>

		Page 114	Page 116
1		A. ABU HBDA	
2	Q. Okay.		the embassy, and they know, they saw my name coming
3	MR. SINAICO: Let's move to Page 8038.		on these papers, and they called me, and they asked
4	It's a few more pages in. And let's zoom in		me, and I said I agree.
5	again, so that Mr. Abu Hbda can see better, so		
6	that I can see better; my eyes are terrible, also.		
7	Q. Do you see that that's your name there,		Q. And who was it that called you, if you
8	sir?		remember?
9	A. Yes.		A. I don't remember exactly, but I think
10	MR. SINAICO: He understands the		someone was working there. His name is Hakim.
11	questions, which is terrific.		Q. Okay. Do you know what Hakim's role was
12	Q. And do you see there's some letters there		in that office?
13	in a foreign letter, which I unfortunately don't		THE INTERPRETER: I'm sorry, can you
14	understand, but do you see next to your name,		repeat the question, sir?
15	there's some foreign letters there?		MR. SINAICO: Sure.
16	A. Yes.		Q. Do you know what Hakim's role was in the
17	Q. And can you tell us what that is?		office? And by that I mean, the General Delegation
18	A. It's my name, "Abu Hbda."		of the United States?
19	Q. That's your name in Arabic?		A. No, I know that he was working there;
20	A. Yes.		that's it.
21	Q. Okay. And underneath that, it says "388."		Q. Okay. Apart from --
22	By the way, do you understand that that's a		Do you remember what Hakim told you in
23	reference to you?		this conversation that you had with him and what you
24	A. Yes.		said to him?
25	Q. Okay. And do you see underneath it, it		A. He asked me if they could put my name on
			the Website to notarize the papers that they
			authenticated.
		Page 115	Page 117
1		A. ABU HBDA	A. ABU HBDA
2	says, "388 Lake View Avenue, Clifton, New Jersey"?		Q. And do you remember anything that you said
3	A. Yes.		to Hakim during the call?
4	Q. And what is that address?		A. Yes, I told him, "yes, I agree."
5	A. This is my office address. I had an		Q. And do you remember anything else about
6	office at that place in the past.		this telephone call that you had with Hakim?
7	Q. Understood. And do you still have an		A. No.
8	office there?		Q. And do you remember any other
9	A. No.		communications that you had with Hakim, apart from
10	Q. Okay. Underneath that, there's a		this telephone call that you described?
11	telephone number. Do you see the telephone number?		A. So, if papers are delayed, or if we have a
12	I think it's a telephone number.		question, we used to call him to inquire about
13	A. Yes.		the -- just the question.
14	Q. And is that a telephone number that you		Q. So, he was a contact of yours at the PLO
15	used for your business?		General Delegations of the United States when that
16	A. This is my personal cell phone.		office was open, correct?
17	Q. Personal cell phone. Got it. So, let me		A. This is the person that I knew -- all -- I
18	ask a question; do you have an understanding as to		knew his name there.
19	how your name came to be placed on a Website of the		Q. Did you ever meet him in person?
20	PLO Delegation to the United States, General		MR. SINAICO: Just let the record reflect
21	Delegation to the United States?		that Mr. --
22	A. Yes, I know.		A. I've never met Hakim in my life. I only
23	Q. And can you explain for the Court how that		saw Hakim on TV.
24	happened?		MR. SINAICO: Let the record reflect that
25	A. So, I used to notarize papers that goes to		before Mr. -- you know, before the translator

	Page 118		Page 120
1	A. ABU HBDA		
2	translated that answer, Mr. Abu Hbda had provided		of Paterson, and I know we looked, that that's a
3	the answer to the question.		large honorary role, and I want to know if you had
4	Q. Okay. Apart from Hakim, did you ever		any honorary delegations that might have been given
5	communicate with any other person who worked at the		to you at the PLO General Delegation of the United
6	office of the PLO General Delegations of the United		States?
7	States?		A. No, there isn't.
8	A. There was another person, his name was		MR. SINAJKO: Cosette, can we bring up
9	Dr. Omar. He was the, you know, legal		Exhibit 12, please, and we're going to mark this
10	representative there, and we used to ask him		as Exhibit 6.
11	questions; the same thing we were doing with Hakim.		(Whereupon, Subpoena to Produce was marked as
12	Q. Okay. Apart from Hakim and Dr. Omar, did		Exhibit 6 for identification, as of April 7th,
13	you ever communicate with anybody else who worked at		2021.)
14	the PLO General Delegation to the United States?		MR. SINAJKO: I'll ask the court reporter
15	A. I don't remember speaking with anyone		to mark it, Subpoena to Produce Documents,
16	else; no.		Information, or Objects, or to Permit Inspections
17	Q. How many times would you say you've		of Premises in Civil Action.
18	communicated with Dr. Omar?		Q. My question to you, Mr. Abu Hbda, feel
19	A. I don't remember; maybe once, twice. I		free to take a look at the document, if you want to
20	don't know. I don't remember.		page through it. Cosette can help you with that.
21	Q. When was the last time you spoke with		Just tell her what you'd like her to do.
22	Hakim, the individual we mentioned a few minutes		My question to you is, after you looked at
23	ago?		the document, is whether you recognize it?
24	A. After they closed the -- cancel it. I		A. Yes, I've seen it.
25	don't know anything about what happened after.		Q. And what do you recognize this document to
	Page 119		Page 121
1	A. ABU HBDA		A. ABU HBDA
2	Q. And what about Dr. Omar? When was the		be?
3	last time you remember communicating with Dr. Omar?		A. This is the Subpoena that was sent to me.
4	A. I don't know; maybe before they closed. I		Q. Okay. Do you recognize this to be the
5	don't remember. I spoke with them either once or		Subpoena by which the Plaintiffs in this case asked
6	twice. I don't know.		you to produce documents?
7	Q. Oh, you think --		A. Yes.
8	Just to be clear about that, you think you		Q. Okay. Now, I know we mentioned this
9	spoke to Dr. Omar only once or twice; is that		before, but I want to spend just a little bit more
10	correct?		time on it because I think we'll be able to do that
11	A. Correct.		a little bit more effectively now than we could
12	Q. Okie doke. Did you ever receive		before. Can you tell me what steps you took to
13	compensation of any type from the PLO General		search for documents that might be responsive to the
14	Delegation to the United States?		Subpoena?
15	A. No.		A. So, I searched in my emails, and I
16	Q. Did you ever hold a title of any kind with		searched in the files, if I have documents about
17	the PLO General Delegation to the United States?		anything, but, usually, we don't keep files.
18	A. No.		Q. Okay. And are these your personal files,
19	Q. Not even an honorary title, like Deputy		sir?
20	Mayor of Paterson, right?		THE INTERPRETER: I'm sorry, this is the
21	A. What is Paterson has to do with the -- it		interpreter. The client is -- he is massaging his
22	doesn't have any relation.		eyes.
23	Q. I'm just asking about honorary titles?		MR. SINAJKO: Is everybody okay? Do we
24	A. No.		need to take a short break.
25	Q. I know you were the Deputy Honorary Mayor		THE INTERPRETER: Okay.

<p style="text-align: right;">Page 122</p> <p>1 A. ABU HBDA</p> <p>2 MR. SINAJKO: Because, like I said at the</p> <p>3 beginning, we could take a break any time you need</p> <p>4 to, sir.</p> <p>5 THE INTERPRETER: No, you can continue,</p> <p>6 sir.</p> <p>7 MR. SINAJKO: Thank you very much.</p> <p>8 Q. I'm going to try to wind this up as</p> <p>9 quickly as I can. I think we're actually getting</p> <p>10 close to the end. The files that you searched for</p> <p>11 documents that might be responsive to the Subpoenas,</p> <p>12 were those your personal files?</p> <p>13 A. The files I have in my office.</p> <p>14 Q. Those are the files at the offices of Awni</p> <p>15 Abu Hbda Documentation Services in Paterson?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Do you have personal files at home</p> <p>18 that might possibly contain documents responsive to</p> <p>19 the Subpoena?</p> <p>20 A. No.</p> <p>21 Q. Okay. And the emails that you searched,</p> <p>22 where were those -- in what account were those</p> <p>23 emails?</p> <p>24 A. My email.</p> <p>25 Q. Your personal email, sir?</p>	<p style="text-align: right;">Page 124</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay. And when did you stop providing</p> <p>3 those services?</p> <p>4 A. I don't remember. In the 90's. I don't</p> <p>5 know.</p> <p>6 Q. And, generally, what was the nature of</p> <p>7 those services?</p> <p>8 A. Paying taxes; something like that.</p> <p>9 Q. All right.</p> <p>10 MR. SINAJKO: Cosette, let's bring up --</p> <p>11 Okay. Let's go to Tab 13, please, and</p> <p>12 let's mark this as our next exhibit. Is this</p> <p>13 Exhibit 7?</p> <p>14 (Whereupon, Tab 13 was marked as Exhibit 7</p> <p>15 for identification, as of April 7th, 2021.)</p> <p>16 MS. VINCENT: It should be Exhibit 11.</p> <p>17 MR. SINAJKO: So, in a letter dated</p> <p>18 April 5, 2021, from Sara Kropf to myself, and my</p> <p>19 partner, Ron Wick.</p> <p>20 Q. I'll ask you, Mr. Abu Hbda, after you've</p> <p>21 had a chance to look at the document, have you seen</p> <p>22 it before?</p> <p>23 A. I think. Ask me to look into my records.</p> <p>24 I'm not sure whether I've seen this document or not.</p> <p>25 Q. Okay. But you see that the second</p>
<p style="text-align: right;">Page 123</p> <p>1 A. ABU HBDA</p> <p>2 A. I have only one email.</p> <p>3 Q. And that's an email account that you use</p> <p>4 for both personal and -- personal and business?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. And just to be clear, and I'm just</p> <p>7 getting this off of one of the Exhibits that I</p> <p>8 mentioned, and I could show you the Exhibit if you</p> <p>9 like, but just to confirm, the email is</p> <p>10 redm@gmail.com; is that correct?</p> <p>11 A. Good.</p> <p>12 Q. And that email account, is that the only</p> <p>13 email account that's used for the business of Awni</p> <p>14 Abu Hbda Documentation Services?</p> <p>15 A. Yes, sir.</p> <p>16 Q. By the way, sir, apart from -- apart from</p> <p>17 you, personally, does any other person work for Awni</p> <p>18 Abu Hbda Documentation Services; do you have any</p> <p>19 other employees?</p> <p>20 A. I work by myself.</p> <p>21 Q. Okay. And, again, just to close off an</p> <p>22 open spot, you had mentioned before that you perform</p> <p>23 accounting services of some type; do you recall</p> <p>24 that?</p> <p>25 A. This was in the past, yes.</p>	<p style="text-align: right;">Page 125</p> <p>1 A. ABU HBDA</p> <p>2 sentence of the first paragraph of the letter says,</p> <p>3 "Mr. Abu Hbda has searched his records for documents</p> <p>4 in response to your Subpoena"; do you see that?</p> <p>5 A. Yes, sir.</p> <p>6 Q. And you see that at the top of the page it</p> <p>7 says, "April 5, 2021"; do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And so I think you had mentioned</p> <p>10 before that you conducted a search of emails and</p> <p>11 files; did you do that work, prior to April 5, 2021?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And did you conduct any searches</p> <p>14 for documents after April 5, 2021?</p> <p>15 A. I don't know. Maybe yesterday I saw</p> <p>16 something. I don't remember, to be honest.</p> <p>17 Q. Okay. Let's look at the third sentence of</p> <p>18 the first paragraph of this letter. In this</p> <p>19 sentence, Ms. Kropf tells my partner Mr. Wick and me</p> <p>20 that you did not have any documents responsive to</p> <p>21 the Subpoena; do you see that, sir?</p> <p>22 A. Exactly.</p> <p>23 Q. Right. And, in fact, ultimately, you did</p> <p>24 locate some documents that were responsive to the</p> <p>25 Subpoena; is that correct, sir?</p>

		Page 126	Page 128
1		A. ABU HBDA	A. ABU HBDA
2		A. I don't know what you mean by that. I	entitled, "Contract for Notary Public Services."
3		don't know.	This will be Exhibit 8.
4		Q. There came a time, sir, did there not,	Q. Mr. Abu Hbda, do you have Exhibit 8 in
5		where you provided some documents that were produced	front of you?
6		to the Plaintiffs, pursuant to the Subpoena in this	
7		case; isn't that right?	
8		A. One paper, maybe.	A. Yes. Yes.
9		Q. Okay. And do you recall how you came to	Q. Okay. All right. And you see that --
10		locate that document?	This is a document -- obviously, you've
11		A. I continued searching in the papers I	seen before because you supplied it to your attorney
12		have, so I found this paper.	who, in turn, supplied it to us recently; is that
13		Q. Okay. Is there any other searching that	correct?
14		you feel you could do to locate additional documents	A. Yeah.
15		responsive to the Plaintiff's Subpoena?	Q. And where was this document physically
16		A. If I find something, I will tell my	located when you found it?
17		attorney immediately about it, but I don't have	A. One of the drawers.
18		anything else.	Q. Okay. Was that a drawer in your office in
19		Q. Right. And how did you -- well, let me	Paterson, or was that a drawer at home, or where was
20		ask you this.	the drawer located?
21		Before Ms. Kropf sent this letter to my	A. In Paterson.
22		partner, Mr. Wick and me, do you believe that you	Q. Okay. And can you tell us what this
23		thoroughly searched your records for documents that	document is.
24		might be responsive to the Subpoena?	A. This is the contract of the Palestinian
25		A. Yes.	Mission. They sent it to me, but I never signed it.
			I never sent it back to them.
			Q. I see. So, this is -- you don't --
		Page 127	Page 129
1		A. ABU HBDA	A. ABU HBDA
2		Q. And how did you conclude that there might	This is a contract that you never actually
3		be additional documents you still needed to look	entered into?
4		for, if you did conclude that?	A. No, no. I -- I refused it. I refused.
5		A. To be honest, I don't know. I just	Q. Well, maybe you could tell me --
6		looked, and I searched in the papers, and I saw	withdrawn.
7		these papers among the -- among the papers.	How did you come to receive this piece of
8		Q. I see. And what did you do after you saw	paper?
9		that piece of paper?	A. I don't know. Maybe it's with one of the
10		A. I sent -- I sent it to my attorney.	notarized papers we sent them, they sent with them
11		Q. And when did you do that, if you remember?	back to us. I don't remember at all. I don't
12		A. Yesterday. Maybe yesterday. I don't	remember at all how I got it.
13		know. I think yesterday.	Q. Do you recall when you received this piece
14		Q. All right.	of paper?
15		MR. SINAICO: Cosette, if we could bring	A. Maybe in 2014, around that time.
16		up Tab 15.	Q. Okay. And you see there's some
17		MS. VINCENT: Okay.	handwriting filled into the document in the middle
18		MR. SINAICO: And let's mark this as our	of the first page?
19		next Exhibit. Let's -- this is going to be	A. Yes.
20		Exhibit 8.	Q. Whose handwriting is that?
21		(Whereupon, Tab 15 was marked as Exhibit 8	A. This is my handwriting.
22		for identification, as of April 7th, 2021.)	Q. Okay. And that's your name, and your
23		MR. SINAICO: It's a document that has	business address that -- that is written in your
24		a -- the logo at the top and heading that says,	handwriting on the first page of Exhibit 8, correct?
25		"General Delegation PLO United States," and is	A. Correct.

Page 130		Page 132
1	A. ABU HBDA	
2	Q. Okay. And this is a piece of paper that	1 A. All people go to see these sessions, or
3	was -- strike that.	2 the meetings. It's -- I did it the same as any
4	Do you recall ever requesting that this	3 member of the public.
5	document be sent to you?	4
6	A. No.	5 Q. So, you were present just as a member of
7	Q. So, as far as you know, this document was	6 the public, correct?
8	gratuitously sent to you by the General Delegation	7 A. Yes.
9	of the PLO to the United States, correct?	8 Q. Apart from the visit to the United Nations
10	A. Yes.	9 where you saw Maen Areikat, have you ever been a
11	Q. And I'm going to turn you to Page 3 of the	10 member of the United Nations at that time?
12	document.	11 A. I take my children and grandchildren
13	MR. SINAJKO: Cosette, if we could just	12 often, every two or three years, to show them from
14	move over there. Can we zoom in on the name	13 the outside the United Nations. So, I take them, my
15	that's in the middle of the page? Do you see what	14 grandchildren, just to show them.
16	I'm talking about there? Perfect. It's a little	15 Q. Okay.
17	hard to read because the quality of the copy is	16 MR. SINAJKO: Looking at -- let's --
18	not very high.	17 let's's zoom out again, please, Cosette.
19	Q. This is what we got from your counsel. Do	18 Q. Looking at Exhibit 8, can you point me to
20	you see there's a name there Maen Areikat; M-A-E-N;	19 any trade secret that's reflected in that document?
21	A-R-E-I-K-A-T?	20 THE INTERPRETER: Sorry. Could you repeat
22	A. Yes.	21 the question again? This is the interpreter.
23	Q. And do you know who that is?	22 MR. SINAJKO: Certainly.
24	A. He's the Ambassador of the Commission.	23 Q. Looking at Exhibit 8, Mr. Abu Hbda, can
25	Q. Have you ever communicated in, orally or	24 you point me to any trade secret in that document?
Page 131		Page 133
1	A. ABU HBDA	
2	in writing, with that person?	1 A. ABU HBDA
3	A. I saw him once, and I had a meeting, and I	2 exactly?
4	went, and he wasn't -- I -- it was a session, and he	3 Q. Well, let me put it a little differently.
5	was there, but I've never spoken with him. I've	4 Mr. Abu Hbda, do you see any information in this
6	never wrote him anything.	5 document that you regard as reflecting a secret that
7	Q. Is that a session of the UN that you	6 you use in your business, secret information that
8	personally attended?	7 you use in your business?
9	A. It's the session of the United Nations.	8 A. I never signed this document. So, what is
10	All representative comes. It happens always.	9 the content? What is inside? It doesn't belong to
11	Q. So, are you talking about a General	10 me. It's -- it doesn't belong to me. I didn't sign
12	Assembly of the UN meeting, sir?	11 it.
13	A. Yeah. Yes.	12 Q. So, would you agree then that this
14	Q. Was that something that you watched in	13 document does not reflect any secret or confidential
15	person or were you present?	14 information concerning your business?
16	A. I went to the one follow-up visit and it	15 A. This document is not related to me. I
17	was present there.	16 don't have any relation whatsoever to this document.
18	Q. I see. So, did you actually interact with	17 Q. Right. So, my question is, would you
19	Maen Areikat, or was it just somebody who you saw?	18 agree that this document does not reflect any secret
20	A. I never spoke or interacted with him.	19 or confidential information concerning your
21	Q. Okay. So, it was just somebody who you	20 business?
22	saw at the United Nations during a visit there?	21 A. I don't understand your question, and I
23	A. Yes, I've only seen him; yes.	22 cannot answer this question because it's not related
24	Q. And why were you present at the United	23 to me.
25	Nations at that time?	24 Q. Okay. So, can we agree that this -- that
		25 this document does not reflect any information at

		Page 134	Page 136
1		A. ABU HBDA	A. ABU HBDA
2		all about the business that you run, that is Awni	2 MS. VINCENT: Yeah, it's Exhibit 8.
3		Abu Hbda Documentation Services?	3 Q. This document that we marked, Exhibit 8,
4		A. I don't understand your question, or what	4 do you regard this document as containing personal
5		you are referring to.	5 or intimate information about any person?
6		Q. Okay. What I'm trying to understand,	6 A. No.
7		Mr. Abu Hbda, is whether this document contains any	7 Q. And do you regard this document as
8		information about your business, Awni Abu Hbda	8 containing personal or intimate information about
9		Documentation Services?	9 any person?
10		A. Again, this is concerning -- this document	10 A. What do you mean by, "personal"? Are you
11		is regarding documentation services, but I haven't	11 referring to me or any person?
12		signed it. I didn't sign it, or do anything with	12 Q. Any person. We already established that
13		it.	13 the document pertaining to you is the information
14		Q. When you received this document from --	14 you make available on your Website. What I'm asking
15		from the PLO General Delegation to the United	15 you is, do you regard this document as containing
16		States, did anybody ask you to keep the document	16 information of a personal or intimate nature of you
17		confidential?	17 or any person?
18		A. No. Nobody asked me about that.	18 A. I don't know anything about this document,
19		Q. And does this document reflect any	19 and I cannot answer anything regarding it.
20		financial information about you or about Awni Abu	20 MR. SINAJKO: Okay. Let's go to Tab 11,
21		Hbda Documentation Services?	21 and we'll mark this as Exhibit 9.
22		A. No.	22 (Whereupon, Tab 11 was marked as Exhibit 9
23		Q. Okay. And do you regard this document as	23 for identification, as of April 7th, 2021.)
24		containing information of a personal nature about	24 MR. SINAJKO: Can we zoom in just a little
25		anyone else or you?	25 bit, Cosette? Just to make it a little more
		Page 135	Page 137
1		A. ABU HBDA	A. ABU HBDA
2		A. It has my name and my address; that's all.	2 legible. So, this is a document that we obtained
3		Q. Right. And do you regard that	3 from the Internet, from the Website of the
4		information -- well, withdrawn.	4 permanent observer Palestine to the United Nations
5		Do you regard that name and business	5 of New York. It's an excerpt from the Website,
6		address as personal or intimate information about	6 and I would ask the court reporter to mark it as
7		you?	7 Deposition Exhibit 9.
8		A. It's a business information.	8 Q. Okay. I just have a few questions about
9		Q. Okay. But publicly available business	9 this one. Mr. Abu Hbda, do you see that there's a
10		information, correct?	10 list of names in the middle of the page here? Let's
11		A. Maybe.	11 zoom in a little bit. It's testing everybody's eyes
12		Q. Well, it's on your Website; isn't it, sir?	12 here. It's hard to see. Can you see that better?
13		A. Yes, that's possible.	13 A. Yes.
14		Q. With your name and telephone --	14 Q. Okay. Can you see that the first name is
15		It's possible. Should we go back and look	15 Riyad Mansour?
16		at the Website again? Would you like me to look at	16 A. Yes.
17		the Website again, sir?	17 Q. And do you know that person?
18		A. I told you. This is a business	18 A. You know.
19		information that is available on the Website.	19 Q. How do you know that person?
20		Q. Okay. Perfect. And this document -- I'm	20 A. I see him in the UN. He comes sometimes
21		going to just come back to one or two other things.	21 for meetings. He participates with people's
22		This document that we've marked as, I think it's	22 concerns. If someone dies, if there is a, like some
23		Exhibit 8.	23 incidents, or if there's a celebration, he comes to
24		MR. SINAJKO: Is it 8? Are we on Exhibit	24 celebrate with us involved in the community.
25		8, Cosette? I think it is Exhibit 8.	25 Q. How many times would you say you've met

		Page 138	Page 140
1		A. ABU HBDA	A. ABU HBDA
2	Mr. Mansour?		Abushawesh; do you see that name, sir?
3	A. I've never had a special meeting with him		A. Yes.
4	in my life. I never sat with him. I see him. I		Q. And have you ever met Abdallah Abushawesh?
5	shake hands with him, like other people do.		A. Yes.
6	Q. Okay. Apart from seeing him, and shaking		Q. You have, right? And who do you
7	hands with him, have you ever had a substantive		understand Abdallah Abushawesh to be?
8	communication with him, beyond pleasantries?		A. I don't know. He works in the UN, in the
9	A. Maybe we speak when there is a		Mission. I don't know.
10	celebration, there is a funeral, there is a wedding,		Q. Would you say that you know Abdallah
11	there is a dinner. So, just in general speaking, we		Abushawesh personally?
12	don't discuss politics; that's general speaking.		A. No.
13	He's a public figure. Everybody knows him.		Q. Have you ever communicated with Abdallah
14	Q. Okay. But your interactions with him,		Abushawesh?
15	Mr. Abu Hbda -- let me withdraw that.		A. I think I saw him once only in the UN, and
16	Mr. Abu Hbda, do you have interactions, or		I spoke with him once; that's it.
17	have you ever had interactions with Mr. Mansour,		Q. And what was the nature of the
18	other than, you know, of a social nature?		conversation, if you remember?
19	A. No.		A. "How are you? How is your family? How is
20	Q. Okay. Let's go to the next person Feda		your children?"
21	Abdelhady-Nasser; do you see that person's name?		Q. And were those questions that he was
22	A. I don't know.		asking of you, or were those questions you were
23	Q. My question -- let me just get a clear		asking of him?
24	question and answer. Do you know Feda		A. We both asked the same questions.
25	Abdelhady-Nasser personally?		Q. I see. And where did this meeting happen?
		Page 139	Page 141
1		A. ABU HBDA	A. ABU HBDA
2	A. No.		A. In the -- it's in the UN.
3	Q. Have you ever met Feda Abdelhady-Nasser?		Q. And what was the context for you meeting
4	A. No.		Abdallah Abushawesh at the UN?
5	Q. To your knowledge, have you ever		THE INTERPRETER: I'm sorry. Interpreter.
6	communicated with Feda Abdelhady-Nasser?		Could you repeat the question?
7	A. No.		MR. SINAICO: Sure.
8	Q. Okay. The next person down on the list		Q. What was the context for you meeting
9	Nadya Rasheed; have you ever seen that, Mr. Abu		Abdallah Abushawesh at the UN?
10	Hbda?		A. There was no specific. He was there, and
11	A. Yes, I see her.		there was some people there, and I saw him.
12	Q. And have you ever met Nadya Rasheed?		Q. Okay. And apart from this one
13	A. No.		communication that you recall, can you recall any
14	Q. And have you ever communicated with Nadya		other communications with Mr. Abdallah Abushawesh?
15	Rasheed?		A. No.
16	A. No.		Q. Okay. Let's go to the next name, Nada
17	Q. Okay. Let's go to the next name on the		Tarbush; do you see that name there, sir?
18	list Majed Bamya; do you see that name?		A. Yes, I do.
19	A. Yes.		Q. Have you ever met Ms. Nada Tarbush?
20	Q. And have you ever met Majed Bamya?		A. No.
21	A. No.		Q. Have you ever communicated with Nada
22	Q. And to your knowledge, have you ever		Tarbush?
23	communicated with Majed Bamya?		A. No.
24	A. No.		Q. Okay. And let's go to the next name on
25	Q. Let's go to the next name, Abdallah		the list. Can you see Ms. Sahar Abushawesh?

		Page 142	Page 144
1		A. ABU HBDA	A. ABU HBDA
2	A. Yes.		THE VIDEOGRAPHER: We are now back on the
3	Q. Okay. And have you ever met Ms. Sahar		record. The time is 20:30 UTC Time.
4	Abushawesh?		Q. Okay. Mr. Abu Hbda, I just have a few
5	A. No.		more questions for you today. Do you recall, sir,
6	Q. Have you ever communicated with Sahar		that we were looking at a list of notaries public
7	Abushawesh?		that was maintained by the PLO General Delegation to
8	A. No.		the United States, a list that you were on?
9	Q. Okay. Let's go down to the next one;		Q. Yes.
10	Ms. Sahar Salam; do you see that name Sahar Salam?		Q. Okay. And are you aware of any other
11	A. Yes, I saw the name, yes.		lists of that nature, that is lists of notary
12	Q. Okay. Have you ever met Sahar Salam?		publics in the United States that are -- that is
13	A. No.		currently maintained by the Palestinian Authority?
14	Q. Okay. And have you ever communicated with		A. I don't have any lists.
15	Ms. Sahar Salam?		Q. No, but were you aware of the existence of
16	A. No.		any such list?
17	Q. Okay. And the last name on the list		A. You can ask the Mission in Canada, the
18	Ms. Nadia Ghannam; do you see that name?		Embassy for me. I don't know.
19	A. I see it, yes.		Q. Ah. So, just to come back to the
20	Q. Okay. And have you ever met Ms. Nadia		question. Were you aware of the --
21	Ghannam?		Were you aware that that Palestinian
22	A. Her name is not strange to me, but I've		Authority maintains any list of notaries in the
23	never met her in person.		United States, similar to the one we looked at from
24	Q. Right. And have you ever communicated		the former PLO General Delegation to the United
25	with Nadia Ghannam?		States?
		Page 143	Page 145
1		A. ABU HBDA	A. ABU HBDA
2	A. No.		A. You have to ask them themselves about
3	MR. SINAICO: Let's move back up to top		this. For me, I don't know.
4	of this page. Page -- Exhibit 9.		Q. You don't know? I'm just trying to
5	Q. Have you -- I guess I'll try to limit the		know --
6	question to at any time during 2020 or 2021, and we		I'm just trying to confirm if you're aware
7	could put aside the conversations with Mr. Mansour		of such a thing or not.
8	that you've already told us about, and the other		A. I don't know. Maybe there is. I don't
9	conversations that you've already told us about, you		know about this.
10	know, in the last couple of minutes.		Q. So, you're unaware of any such list, just
11	Putting aside those conversations, do you		to be clear?
12	recall, at any time in 2020 or 2021, having any		A. I don't have a list or know, but maybe
13	communication with anybody that you understood to be		there is a list with names on it. I don't know.
14	an employee of, or an agent of, or affiliated with		Q. Okay. And do you know whether any such
15	the permanent member of the State of Palestinian		list is maintained by the Palestinian Liberation
16	Mission in New York?		Organization?
17	A. No.		A. Why don't you go and ask the PLO? Why --
18	MR. SINAICO: Alrighty. If we could -- I		how would I know about that?
19	think I'm actually close to finished. If we could		Q. I'm just asking you, sir, if you could let
20	go off the record. I probably want 15 minutes to		us know if you're aware of any such ID, I'd be
21	gather my notes, and I think we're very close to		grateful.
22	done. Would it be all right if we took a break?		A. I don't know. I don't have a list. I
23	MS. KROPF: If we could do a little		know there's people who sign, but I don't have a
24	shorter than 15 minutes.		list. I don't know.
25	(Whereupon, a short recess was taken.)		Q. Okay. And the office that you mentioned

		Page 146	Page 148
1	A. ABU HBDA		
2	in Canada to which you send documents when you would		your business Awni Abu Hbda Documentation Services?
3	like them legalized or certified by the Palestinian		3 A. No. The Authority or the government, they
4	Authority, do you know where that office in Canada		4 don't send anything to us. They haven't sent
5	maintains such a list, just to your knowledge? I'm		5 anything to us.
6	not asking whether they do or not. I'm asking if		6 Q. Okay. Were you aware whether at any time
7	you know whether they do or not.		7 January 4, 2020, the Palestinian Liberation
8	MR. BERGER: I'm going to object to the		8 Organization has referred any customers or clients
9	form as misstating his prior testimony.		9 to your business Awni Abu Hbda Documentation
10	But, you could answer.		10 Services?
11	Q. Let me put the question again in a way		11 A. No, they haven't sent anything.
12	that will hopefully not draw an objection. The		12 Q. Okay. Are you aware whether this office
13	office in Canada that we've been speaking about		13 in Canada that we've been talking about, the one
14	today; you know what I'm talking about, correct,		14 which you sent the document with the red and blue
15	sir?		15 stamp on it, were you aware whether that office,
16	A. I know, but I don't know what the Mission,		16 since January 2020, has referred any customers or
17	or the office in Canada knows, or keeps, or what		17 clients to your business Awni Abu Hbda Documentation
18	they don't know. You could call them and ask them		18 Services?
19	about that.		19 Just looking at the realtime record, I
20	Q. You're getting ahead of me a little bit.		20 want to be sure that my record reflects my question
21	I'm first trying to make a clear record here. The		21 pertains to any referrals of customers or clients on
22	office in Canada, remember we looked at the document		22 or after January 4, 2020.
23	that had the red stamp and the blue stamp on it?		23 A. No.
24	A. Yes.		24 Q. Okay. And are you aware whether the
25	Q. Okay. And you remember that was the		25 Permanent Observer Mission to the United Nations
		Page 147	Page 149
1	A. ABU HBDA		A. ABU HBDA
2	document that you sent to an office in Canada,		Mission in New York has referred any customers or
3	correct?		clients to Awni Abu Hbda Documentation Services on
4	A. Correct.		4 or after January 4, 2020?
5	Q. Okay. And that office in Canada, were you		5 A. No, they didn't.
6	aware of whether that office in Canada maintains a		6 Q. And on or after January 4, 2020, have you
7	list of notary publics in the United States who can		7 been paid any money or given anything of value by
8	perform notarial services, and a list that we looked		8 the Palestinian Liberation Organization?
9	at before to the PLO General Delegation to the		9 A. No.
10	United States?		10 Q. And on or after January 4, 2020, have you
11	A. I don't know. I know they had my name,		11 been paid any money, or given anything of value by
12	but for other names, I don't know.		12 the Palestinian Liberation Organization?
13	Q. You know they have your name?		13 A. No.
14	A. They signed my paper, so they know my		14 Q. And on or after January 4th, 2020, have
15	name.		15 you been given any -- have you been paid any money
16	Q. Got it. Okay. And one further question,		16 or given anything of value by the, you know, by the
17	are you aware whether the permanent observer to the		17 office in Canada that we referred to before, the one
18	United Nations maintains a list of notaries public,		18 to which you sent the document with the red and the
19	in the United States similar to the one maintained		19 blue stamp?
20	by the General Delegations PLO to the United States?		20 A. No.
21	A. I don't know anything about the Mission of		21 Q. And on or after January 4, 2020, have you
22	the UN; I don't know anything about it.		22 been paid any money, or given anything of value by
23	Q. Okay. Were you aware that any time after		23 the Permanent Observer Mission to the United Nations
24	January 4, 2020, that's January 4 of last year, the		24 in New York City, the one we've been talking about?
25	Palestinian Authority has referred any customer to		25 A. No.

		Page 150	Page 152
1		A. ABU HBDA	A. ABU HBDA
2	Q.	On or after January 4, 2020, have you	2 A. On TV.
3		entered into any agreements with the Palestinian	3 Q. And do you know from where Mr. Mansour
4		Authority?	4 delivered the speech that you delivered on TV?
5	A.	No.	5 Sorry, let me withdraw that.
6	Q.	On or after January 4, 2020, have you	6 Do you know where Mr. Mansour delivered
7		entered into any agreements with the Palestinian	7 the speeches that you saw him deliver on television?
8		Liberation Organization?	8 A. How would I know, but most of them are in
9	A.	No.	9 the UN.
10	Q.	And on or after January 4, 2020, have you	10 Q. Do you know the locations of any are --
11		entered into any agreements with the office in	11 that are not in the UN?
12		Canada that we've been talking about to which you	12 A. No, I don't know.
13		sent the document, the red and the blue stamp?	13 Q. Have you ever seen Mr. -- apart from
14	A.	No.	14 social gatherings, have you ever seen Mr. Mansour in
15	Q.	And on or after January 4, 2020, have you	15 person, other than at the United Nations
16		entered into any agreements with the Permanent	16 headquarters?
17		Observer Mission to the United Nations Mission in	17 A. No.
18		New York?	18 Q. Okay. And turning back to just
19	A.	No.	19 momentarily -- and we could put the list up if we
20	Q.	By the way, just to clarify, you	20 need to -- turning back to the list of personnel
21		understand that my questions about the Permanent	21 from Exhibit 9, the list of personnel from the
22		Observer Mission, you know, the Permanent Observer	22 Permanent Observer Mission in New York, have you
23		Mission to the United Nations in New York, that's a	23 ever seen -- and apart from the social occasions
24		reference to the -- hang on one second, the -- the	24 that you mentioned with respect to Mr. Mansour, have
25		entity whose Website, you know, we looked at as	25 you ever seen any of those individuals, other than
		Page 151	Page 153
1		A. ABU HBDA	A. ABU HBDA
2		Exhibit 9; you understand that, correct?	2 the individuals from the UN headquarters in New
3	A.	Yes, sir.	3 York?
4	Q.	And apart from seeing Mr. Mansour at the	4 A. No. No.
5		United Nations, or seeing Mr. Mansour at social --	5 Q. Okay. Let me go on mute for 30 seconds.
6		on social occasions of the sort that you described,	6 I think I'm done. I just want to confirm. Hang on
7		that is to say family events, I suppose it was	7 one sec.
8		funerals you mentioned -- let me withdraw that.	8 MR. SINAJKO: Okay. Mr. Abu Hoda, I have
9		You mentioned before that you've seen	9 no further questions for you at this time, and I'm
10		Mr. Mansour at certain types of events outside of	10 prepared to hand the Witness over to Mr. Berger,
11		the United Nations; do you remember that?	11 if he'd like to examine.
12	A.	Maybe; yes.	12 MR. BERGER: Yes. Thank you. And thank
13	Q.	Can you just give us a description of the	13 you for your patience.
14		sort of events those were? I know we're going back	14
15		a little bit, but I just want to try to refresh your	15
16		recollection.	16
17	A.	It's from gathering, maybe a wedding, a	17
18		funeral; it's something -- it's not related, and	18
19		even if it's in New York, it's not in the same area.	19
20	Q.	Okay. Apart from these social gatherings,	20
21		are you aware of any other activities that	21
22		Mr. Mansour engages in here in the United States?	22
23	A.	How would I know?	23
24	Q.	Well, have you ever attended, for example,	24
25		a speech that Mr. Mansour delivered?	25

Page 154		Page 155
1	A. ABU HBDA	1
2	EXAMINATION BY	2
3	MR. BERGER:	3
4	Q. Mr. Abu Hbda, I won't take very much of	4
5	your time. My name is Mitchell Berger. I'm one of	5
6	the lawyers for the Palestinian Liberation	6
7	Organization, and for the record, have we ever met	7
8	before.	
9	A. No.	
10	Q. Thank you. I want to take you back to a	
11	question that Mr. Sinaiko asked you, and an answers	
12	you gave earlier this afternoon. It was at Page 74,	
13	starting at Line 1 of the --	
14	MR. SINAIKO: Would you mind if I just --	
15	back there? I just need a moment.	
16	MR. BERGER: Go ahead. Let me know when	
17	you're -- you're at Page 74 line --	
18	MR. SINAIKO: Go ahead. Okie Doke. I'm	
19	there.	
20	Q. Okay. So, Mr. Abu Hbda, you were asked	
21	this question and you gave this answer. Question,	
22	"Sir, have you ever had personal authority to	
23	provide certification of a document on behalf of the	
24	Palestinian Authority?"	
25	And you gave the answer, "no."	
1	A. ABU HBDA	1
2	Do you recall being asked that question	2
3	and being given that answer?	3
4	A. Yes.	4
5	Q. Okay. I would like to use Mr. Sinaiko's	5
6	phrasing of, "on behalf of," and ask you two	6
7	questions, if I may. Is that all right with you?	7
8	A. Yes.	8
9	Q. Okay. Since January 4, 2020, have you	9
10	provided any services on behalf of the Palestinian	10
11	Authority?	11
12	MR. SINAIKO: Objection.	12
13	A. No.	13
14	Q. Since January 4, 2020, have you provided	14
15	any services on behalf of the Palestinian Liberation	15
16	Organization?	16
17	MR. SINAIKO: Objection.	17
18	A. No.	18
19	MR. BERGER: That's all I have. Thank	19
20	you.	20
21	MR. SINAIKO: Mr. Abu Hbda, we really	21
22	appreciate your time today and your patience.	22
23	THE VIDEOGRAPHER: We are now --	23
24	MR. SINAIKO: Before we go off the record,	24
25	I had one question to ask of Sara.	25
1	A. ABU HBDA	1
2	MS. KROPF: Yeah.	2
3	MR. SINAIKO: So, while we're on the	3
4	record, in light of Mr. Abu Hbda's testimony	4
5	today, can we withdraw the Confidential	5
6	designation on the document that was produced to	6
7	us? Can you withdraw that designation?	7
8	MS. KROPF: You know, let me just double	8
9	check my client candidly -- I put that on because	9
10	my client -- let me talk to him about that and get	10
11	back to you.	11
12	MR. SINAIKO: It seems pretty clear from	12
13	the testimony that there's no basis for the	13
14	confidential designation or run around getting	14
15	confidential designations withdrawn. I figured I	15
16	would just ask.	16
17	MS. KROPF: Can you send me whatever	17
18	Protective Order's in place, so I could look at	18
19	the language?	19
20	MR. SINAIKO: Erica, could you take a look	20
21	at that?	21
22	MS. LAI: We could go off the record.	22
23	(Continued on next page to accommodate	23
24	jurat.)	24
25		25
1	A. ABU HBDA	1
2	THE VIDEOGRAPHER: Okay. If everyone's	2
3	ready. We are now off the record. The time is	3
4	20:54 UTC Time, and this concludes today's	4
5	testimony given by Awni Abu Hbda Documentation	5
6	Services. Thank you, everyone. Thank you,	6
7	Mr. Abu Hbda.	7
8	-00-	8
9	(Whereupon, the examination of AWNI ABU HBDA	9
10	was concluded at 4:54 p.m.)	10
11		11
12		12
13		13
14	AWNI ABU HBDA	14
15		15
16		16
17		17
18		18
19		19
20		20
21		21
22		22
23		23
24		24
25		25

Page 158

1

2 C E R T I F I C A T E

3

4 I, AMBRIA IANAZZI, do hereby Certify:
 5 THAT AWNI ABU HBDA was sworn under penalty of
 6 perjury by a Notary Public.

7

8 THAT the deposition transcript herein is a
 9 verbatim record of the testimony given by AWNI ABU
 10 HBDA, stenographically record by a Registered
 11 Professional Reporter, and Certified Realtime
 12 Reporter.

13

14 THAT I am not related to any of the Parties
 15 to this Action by blood or marriage; and I have no
 16 interest, financial or otherwise, in the outcome of
 17 the case.

18

19

20 CERTIFICATION DATE: April 12th, 2021.

21

22

23

24

Ambria Janazzi

25

AMBRIA IANAZZI, RPR, CRR, RCR, CSR

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1 Errata Sheet

2

3 NAME OF CASE: SHABTAI SCOTT SHATSKY -against- PALESTINE LIBERATION ORGANIZATION

4 DATE OF DEPOSITION: 04/07/2021

5 NAME OF WITNESS: Awni Abu Hba

6 Reason Codes:

- 7 1. To clarify the record.
- 8 2. To conform to the facts.
- 9 3. To correct transcription errors.

10 Page ____ Line ____ Reason ____

11 From _____ to _____

12 Page ____ Line ____ Reason ____

13 From _____ to _____

14 Page ____ Line ____ Reason ____

15 From _____ to _____

16 Page ____ Line ____ Reason ____

17 From _____ to _____

18 Page ____ Line ____ Reason ____

19 From _____ to _____

20 Page ____ Line ____ Reason ____

21 From _____ to _____

22 Page ____ Line ____ Reason ____

23 From _____ to _____

24

25 _____

Exhibits	EX 0007 Awni Abu Hba 04072	1	15-minute
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